

# **EPA JACKET 61470-1**

## **Vol.2**

# Material Sent for Data Extraction

Reg # 61470-1

Description: Notification

☐ Material(s) Sent to Data Extraction Contractors:

☐ New Stamped Label Dated \_\_\_\_\_

☒ Notification Dated 10/18/12

☐ New CSF(s) Dated \_\_\_\_\_

☐ Other: \_\_\_\_\_

☒ Decision #: 470570

☐ Other Action/Comments: \_\_\_\_\_

Attach this coversheet to the top of the material or jacket. It must be well organized and clipped together, NOT STAPLED. Then give the material with this coversheet to staff in the Information Services Center (Room S-4900).

Reviewer: G. McLeod

Phone: \_\_\_\_\_ Division: AD

Date: 10/18/12

Created February 3, 2011

**TASK ASSIGNMENT FORM**  
Antimicrobial Division/Regulatory Management Branches

*Notification?*

<b>ORIGINATOR/PRODUCT REVIEWER:</b> <i>Glen McLeod</i>				<b>RMB II TEAM</b> <u>34</u>			
<b>Decision No:</b>		<b>Submission No:</b> <i>924411</i>		<b>EPA File Symbol/Reg No.</b>			
<b>PRIA Fee:</b> \$		<b>Action Code:</b> <i>ADAM 332</i>		<i>61470-1</i>			
<b>GPRA:</b>	<b>FQPA</b>	<b>Non-FQPA</b>		<b>Product Re-reg.</b>			
<b>PRIA:</b>	<b>ME-TOO</b>	<b>New Use</b> <input type="checkbox"/>	<b>Old Chemical</b>	<b>New Chemical</b> <input type="checkbox"/>	<b>Amend w/data</b>		
		<b>MONTH</b>	<b>DAY</b>	<b>YEAR</b>			
<b>APPLICATION DATE</b>		<i>9</i>	<i>25</i>	<i>2012</i>			
<b>EPA PIN DATE</b>		<i>9</i>	<i>27</i>	<i>2012</i>			
<b>DATE PM RECEIVED FROM FRONT END</b>				<i>2012</i>			
<b>DATE SENT TO SCIENCE</b>				<i>2012</i>			
<b>DATE RECEIVED FROM SCIENCE</b>							
<b>NEGOTIATED DUE DATE</b>				<b>DATE DUE OUT OF AGENCY</b>		<i>10/27/12</i>	
<b>Type of Data:</b>	<b>PSB Product Chemistry</b>	<b>PSB Acute Toxicology</b>	<b>PSB Efficacy</b>	<b>RASSB Environmental Fate</b>	<b>RASSB Ecological Effects</b>	<b>RASSB Chronic Toxicology</b>	<b>RASSB Exposure/Residue</b>

**Comments:** Please provide hard and electronic copy of deliverable(s).

*Notification: Please review the CSFs. Registrant is adding new manufacturers.*  
*Also, change primary brand name to Coal Tar Creosote*



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460

OCT 18 2012

OFFICE OF  
PREVENTION, PESTICIDES  
AND TOXIC SUBSTANCES

Micah T. Reynolds  
Regulatory Consultant to RÜTGERS Germany GmbH  
c/o Technologies Sciences Group Inc.  
1150 18<sup>th</sup> Street, Suite 1000  
Washington, DC 20036

Subject: **KMG-B Coal Tar Cresote**  
EPA Registration No. 61470-1  
Application Date: September 25, 2012  
Receipt Date: September 27, 2012

Dear Mr. Reynolds:

This acknowledges receipt of your Notification submitted under the provision of PR Notice 98-10, and FIFRA section 12(a) (1) (c).

**Proposed Notification:**

Registrant is submitting a brand name change and adding a new manufacturing site.

**General Comment:**

Based upon a review of the material submitted, the Alternate # 1 CSF dated 09/21/2012 is in compliance with PR Notice 91-2 and in agreement with the label.

Should you have any questions or comments concerning this letter, you may contact me by telephone at (703) 308-6416 or by e-mail at [campbell-mcfarlane.jacqueline@epa.gov](mailto:campbell-mcfarlane.jacqueline@epa.gov), or Glen McLeod by telephone at (703) 347-0181 or by e-mail at [mcleod.glen@epa.gov](mailto:mcleod.glen@epa.gov). When submitting information or data in response to this letter, a copy of this letter should accompany the submission to facilitate processing.


Sincerely,

  
Jacqueline Campbell  
Product Manager (34)

Regulatory Management Branch II  
Antimicrobials Division (7510H)

CONCURRENCES							
SYMBOL							
SURNAME							
DATE							

Pages 5-6\*Claimed confidential by submitter\*

	United States <b>Environmental Protection Agency</b> Washington, DC 20460	<input type="checkbox"/> Registration <input checked="" type="checkbox"/> Amendment <input type="checkbox"/> Other	OPP Identifier Number
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**Application for Pesticide – Section I**

1. Company/Product Number <div style="text-align: center; font-weight: bold;">61470-1</div>	2. EPA Product Manager <div style="text-align: center; font-weight: bold;">Jacqueline Campbell</div>
4. Company/Product (Name) <div style="text-align: center; font-weight: bold;">Coal Tar Creosote</div>	3. Proposed Classification <div style="text-align: right;"> <input type="checkbox"/> None    <input checked="" type="checkbox"/> Restricted         </div>
5. Name And Address Of Applicant (Include ZIP Code) <div style="text-align: center;"> <b>RÜTGERS Germany GmbH</b>  <b>Kekulestrasse 30</b>  <b>44579 Castrop-Rauxel, Germany</b> </div> <div style="text-align: left; margin-top: 5px;"> <input type="checkbox"/> Check if this is a new address         </div>	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____

**Section II**

<input checked="" type="checkbox"/> Amendment – Explain below. <input type="checkbox"/> Resubmission in response to Agency letter dated _____ <input type="checkbox"/> Notification – Explain below.	<input type="checkbox"/> Final Printed labels in response to Agency letter dated _____ <input type="checkbox"/> "Me Too" Application. <input type="checkbox"/> Other – Explain Below.
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**Explanation:** Use additional page(s) if necessary. (For section I and Section II.)

**Submission of Minor Formulation Amendment to add new alternate formulation CSF (new site of manufacture) and change primary brand name of product. This application is a Minor Formulation Amendment (PR Notice 98-10); not subject to PRIA.**

This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

**Please confirm receipt with Micah Reynolds: mreynolds@tsqusa.com, via phone (202) 828-8967, or via fax (202) 872-0745.**

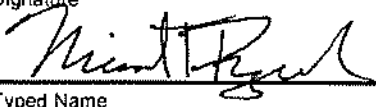
**Section III**

1. Material This Product Will Be Packaged In:			
Child Resistant Packaging <input type="checkbox"/> Yes* <input type="checkbox"/> No <b>* Certification must be submitted</b>	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No If "Yes"      No. per Unit Packaging wgt.      Container	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No If "Yes"      No. per Unit Packaging wgt.      Container	2. Type of Container <input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container	4. Size(S) Retail Container	5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithographed <input type="checkbox"/> Other _____ <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled			

**Section IV**

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)

Name <b>Micah T. Reynolds, Technology Sciences Group, Inc.</b>	Title <b>Regulatory Consultant</b>	Telephone No. (Include Area Code) <b>(202) 828-8967</b>
---	---------------------------------------	--

<b>Certification</b> I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.	6. Date Application Received (Stamped)	
2. Signature 	3. Title <b>Regulatory Consultant to RÜTGERS Germany GmbH</b>	
4. Typed Name <b>Micah T. Reynolds</b>	5. Date <b>September 25, 2012</b>	

# Material Sent for Data Extraction

Reg # 61470-1

Description: Notification

☐ Material(s) Sent to Data Extraction Contractors:

☐ New Stamped Label Dated \_\_\_\_\_

☒ Notification Dated 10/18/12

☐ New CSF(s) Dated \_\_\_\_\_

☐ Other: \_\_\_\_\_

☒ Decision #: 470190

☐ Other Action/Comments: \_\_\_\_\_

Attach this coversheet to the top of the material or jacket. It must be well organized and clipped together, NOT STAPLED. Then give the material with this coversheet to staff in the Information Services Center (Room S-4900).

Reviewer: Louisa Rivas

Phone: \_\_\_\_\_ Division: AD

Date: \_\_\_\_\_

Created February 3, 2011

**TASK ASSIGNMENT FORM**  
Antimicrobial Division/Regulatory Management Branches

ORIGINATOR/PRODUCT REVIEWER: <i>Lorena Rivas</i>				RMB II TEAM <u>34</u>			
Decision No: <i>470190</i>		Submission No: <i>923935</i>		EPA File Symbol/Reg No.			
PRIA Fee: \$		Action Code: <i>332</i>		<i>61470-1</i>			
GPRA:	FQPA	Non-FQPA			Product Re-reg.		
PRIA:	ME-TOO	New Use <input type="checkbox"/>	Old Chemical	New Chemical <input type="checkbox"/>	Amend w/data		
		MONTH	DAY	YEAR			
APPLICATION DATE		<i>9</i>	<i>17</i>	2012			
EPA PIN DATE		<i>9</i>	<i>19</i>	2012			
DATE PM RECEIVED FROM FRONT END				2012			
DATE SENT TO SCIENCE				2012			
DATE RECEIVED FROM SCIENCE							
NEGOTIATED DUE DATE				DATE DUE OUT OF AGENCY		<i>10/27/12</i>	
Type of Data:	PSB Product Chemistry	PSB Acute Toxicology	PSB Efficacy	RASSB Environmental Fate	RASSB Ecological Effects	RASSB Chronic Toxicology	RASSB Exposure/Residue

Comments: Please provide hard and electronic copy of deliverable(s).

*Notification : ~~AMMANA~~ Brand Name Change  
Primary*



## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Micah Reynolds  
Regulatory Consultant to RUTGERS Germany GmbH  
Technology Sciences Group, Inc.  
1150 18<sup>th</sup> Street, Suite 1000  
Washington, D.C. 20036

Subject: KMG-B Coal Tar Creosote  
EPA Registration No.: 61470-1  
Notification Date: September 17, 2012  
EPA Receipt Date: September 19, 2012

Dear Mr. Reynolds,

This letter acknowledges receipt of your notification submitted under the provisions of FIFRA section 3(c)9 and PR Notice 98-10.

**Proposed Notification**


- To update and replace the primary brand name from: "KMG-B Coal Tar Creosote" to "Coal Tar Creosote".
- KMG-B Coal Tar Creosote will remain as an Alternate brand name.

**General Comments**

Based on a review of the submitted materials, your notification to update and replace the primary brand name and to retain KMG-B Coal Tar Creosote as the alternate brand name is acceptable. A copy of this letter has been made a part of the record on file for future reference.

Should you have any questions or comments concerning this letter, you may contact me by telephone at (703) 308-6416 or by e-mail at [campbell-mcfarlane.jacqueline@epa.gov](mailto:campbell-mcfarlane.jacqueline@epa.gov) or Lorena Rivas by telephone at (703) 305-5027 or by e-mail at [rivas.lorena@epa.gov](mailto:rivas.lorena@epa.gov). When submitting information or data in response to this letter, a copy of this letter should accompany the submission to facilitate processing.

Sincerely,

  
Jacqueline Campbell-McFarlane  
Product Manager (34)  
Regulatory Management Branch II  
Antimicrobials Division (7510P)

**CONCURRENCES**

SYMBOL	7510P							
SURNAME	J. Rivas							
DATE	10/15/12							

**RESTRICTED USE PESTICIDE**

Due to chronic toxicity in animal studies

For sale to and use only by Certified Applicators or persons under their direct supervision and only for those uses covered by the Certified Applicator's certification.

# COAL TAR CREOSOTE

(Alternate Brand Name: KMG-B Coal Tar Creosote)

FOR PRESSURE TREATMENT OF WOOD

**Active Ingredient:**

Coal Tar Creosote (AWPA P1/P13)

98.0 %

CAS No. 8001-58-9

**Inert Ingredients**

2.0 %

**Total**

100.0 %

## WARNING

See [side] [back] panel for additional precautionary statements, [First Aid], and complete Directions for Use

EPA Reg. No. 61470-1

EPA Est. No.

Net contents \_\_\_\_\_ gallons

**NOTIFICATION**

Date Reviewed: 11/11/12

Reviewed By: \_\_\_\_\_

**Manufactured by:**

RÜTGERS Germany GmbH

Kekuléstr. 30

Castrop- Rauxel 44579

Germany

FIRST AID	
If in eyes	<ul style="list-style-type: none"> <li>• Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li> <li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
If swallowed	<ul style="list-style-type: none"> <li>• Call poison control center or doctor immediately for treatment advice.</li> <li>• Do not induce vomiting unless told to do so by the poison control center or doctor.</li> <li>• Do not give anything by mouth to an unconscious person.</li> </ul>
If on skin or clothing	<ul style="list-style-type: none"> <li>• Take off contaminated clothing.</li> <li>• Rinse skin immediately with plenty of water for 15-20 minutes.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
If inhaled	<ul style="list-style-type: none"> <li>• Move person to fresh air</li> <li>• If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible.</li> <li>• Call a poison control center or doctor for further treatment advice.</li> </ul>
HOTLINE NUMBER	
Have the product label or MSDS with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-800-424-9300 for emergency medical treatment information.	
NOTE TO PHYSICIAN	
Probable mucosal damage may contraindicate the use of gastric lavage. Vomiting may cause aspiration pneumonia.	

### PRECAUTIONARY STATEMENTS

#### HAZARDS TO HUMANS AND DOMESTIC ANIMALS

**WARNING:** Causes substantial but temporary eye injury. Harmful if swallowed or absorbed through skin. Avoid breathing vapors of heated material. Do not get in eyes, on skin or on clothing. Wear protective eye wear (goggles, protective glasses or face shield). Wash thoroughly after skin contact, before eating, drinking, chewing gum, using tobacco products, or using restrooms. Remove and wash contaminated clothing before reuse. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals.

Prolonged and repeated skin exposure over many years in the absence of recommended hygiene practices may lead to changes in skin pigmentation, benign skin growth and in some cases, result in skin cancer. The inhalation exposure limit to creosote vapor is 0.2 mg/m<sup>3</sup> OSHA PEL (\* Hour TWA) for Coal Tar Pitch Volatiles (benzene soluble fraction) as specified in 29 CFR 1910.1002. Prolonged or repeated inhalation exposure above the limit may lead to respiratory system effects such as inflammation and possibly changes in liver, thyroid and blood elements.

See side panel for additional precautions and First Aid.

### **PERSONAL PROTECTIVE EQUIPMENT (PPE)**

All personnel handling treated wood or handling treating equipment (including poles/hooks used to retrieve charge cables) that has come into contact with preservative must wear the following PPE:

- Washable or disposable coveralls or long-sleeved shirt and long pants,
- Chemical resistant gloves, and
- Socks plus industrial grade safety work boots with chemical resistant soles.

All personnel cleaning or maintaining the treatment cylinder gasket/equipment or working with concentrate or wood treatment preservative must wear the following PPE:

- Washable or disposable coveralls or long-sleeved shirt and long pants,
- Chemical resistant gloves,
- Socks plus industrial grade safety work boots with chemical resistant soles, and
- A full face shield.

In the event of equipment malfunction, or for door spacer placement, all personnel located within 15 feet of the cylinder opening prior to cylinder ventilation must wear the following PPE:

- Washable or disposable coveralls or long-sleeved shirt and long pants,
- Chemical resistant gloves,
- Socks plus industrial grade safety work boots with chemical resistant soles, and
- A properly fitting half mask elastomeric respirator with appropriate cartridges and/or filters.

Entry to confined spaces is regulated by Federal and/or State Occupational Safety and Health Programs. Compliance is mandated by law. Individuals who enter pressure treatment cylinders or other related equipment that is contaminated with the wood treatment preservative (e.g. cylinders that are not free of treatment preservative or preservative storage tanks) must wear protective clothing and/or equipment as required by Federal and/or State Occupational Safety and Health Compliance laws.

### **USER SAFETY REQUIREMENTS**

Personnel must leave aprons, protective coveralls, chemical resistant gloves, work footwear, and any other material contaminated with preservative at the treatment facility.

Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables exist, use detergent and hot water. Keep and wash PPE separately from other laundry.

Discard clothing and other absorbent material that have been drenched or heavily contaminated with the product's concentrate. Do not reuse them.

Eating, drinking, smoking are prohibited in the treatment cylinder load-out area, drip pad area, and engineering control room of the wood treatment facilities. EXCEPTION: Where treating operator control rooms are isolated from the treating cylinders, drip pad, and work tanks, eating, drinking, and smoking (depending on local restrictions) are permitted.

Users must:

- Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet,
- Remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

## ENVIRONMENTAL HAZARDS

This product is toxic to aquatic organisms. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or other waters unless in accordance with the requirements of a National Pollution Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

## DIRECTIONS FOR USE

**It is a violation of federal law to use this product in a manner inconsistent with its labeling.**

For terrestrial and aquatic nonfood wood/wood structure protection treatments via pressure methods for utility poles/crossarms, railroad ties, switch ties, bridge timbers, fence and guardrail posts, foundation timbers, marine and foundation round piles, sawn lumber and timber products, and exterior structural composite glue laminated wood and plywood products. Treated wood is intended for exterior/outdoor uses only.

## APPLICATION

Engineering Controls to be put in place as of December 31, 2013:

- For pressure treatment with creosote, automatic, remotely operated devices must be used to open, close, lock, and unlock cylinder doors,
- Mechanical methods must be used to place/remove bridge rails

General Instructions for Creosote Pressure Treatment:

- Cylinder openings and door pits must use grating and additional measures such as sumps, dams or other devices which prevent or remove spillage of the preservative.
- Personnel must not directly handle the charge tables, poles or hooks used to retrieve charge cables, or other equipment that has contacted the preservative without wearing chemical resistant gloves.
- In the event of equipment malfunction, or to place the spacer to hold the door open during venting, only personnel wearing specified PPE are permitted within 15 feet of the cylinder opening prior to ventilation.

The Treatment Process:

- A final vacuum must be used to remove excess preservative from the wood. The final vacuum must attain a vacuum equal to or greater than the initial vacuum. This vacuum must be held for an appropriate time period based on wood species, retention levels, and commodity treated to remove excess preservative from the wood.
- After creosote treatment, wood must be moved to a drip pad capable of recovering excess preservative until the wood is drip free.

#### Post-Treatment Procedures:

Creosote-treated wood intended for use in aquatic or marine environments must be processed using one of the following alternative procedures, as determined by the treater:

- **Expansion Bath** – Following the pressure period, creosote should be heated from 10 - 20 degrees F. above press temperatures (consistent with the preservative and species temperature limitations set by AWWPA) for a minimum of one hour. Pump creosote back to storage and apply a minimum vacuum of 22 inches of Hg (adjusted for location elevation) for a minimum of two hours.
- **Steaming** – Following the pressure period, and after the creosote has been pumped back to the work tank, a vacuum must be applied for a minimum of two hours at not less than 22 inches of Hg (adjusted for location elevation) to recover excess preservative. Release vacuum back to atmospheric pressure and steam for two hours for lumber and timbers and three hours for round piling. Maximum temperature during this process should not exceed 240 degrees F. Apply a second vacuum for a minimum of four hours at 22 inches of Hg (adjusted for location elevation).
- **Double Vacuuming** – Following the pressure period and after the creosote has been pumped back to the work tank, a vacuum must be applied for a minimum of one hour at not less than 22 inches of Hg (adjusted for location elevation) to recover excess preservative. Release vacuum back to atmospheric pressure and then follow with a second vacuum of not less than 22 inches of Hg (adjusted for location elevation) for a minimum period of three hours.

Ventilation Process (at conclusion of treatment) to be put in place as of December 31, 2013:

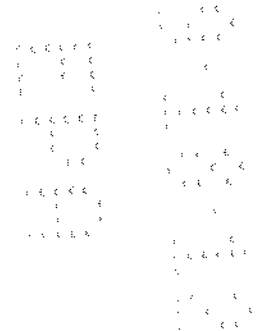
- The cylinder must be ventilated by purging the post-treatment cylinder through fresh air exchange. The ventilation process is considered complete after a minimum of 2 volume exchanges based on the empty treatment cylinder volume. The exhaust pipe of the vacuum system or any air moving device utilized in conducting the air purge must terminate into a containment vessel such as a treating solution work tank or water/effluent tank.
- The ventilation process may be accomplished by one of the following methods: 1) activating an air purge system that operates while the cylinder door remains closed; or 2) using a device to open and hold open the cylinder door (no more than 6 inches) to allow adequate ventilation and activating the vacuum pump.
- If the second method is utilized, at the conclusion of the treatment, no personnel may be located within 15 feet of the cylinder when open (cracked) until the cylinder has been ventilated.
- After ventilation is complete, the cylinder door may be completely opened.

### STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

**Pesticide Storage:** In case of spillage, absorb (with sand, earth, etc.) and dispose of in accordance with applicable Federal, State and local regulations. Contaminated materials must be handled and managed as a RCRA Hazardous Waste and treated before disposal in an approved landfill. This waste is identified by the EPA as a U051 hazardous waste and must meet the treatment standards specified in 40 CFR 268 Subpart D. An RCRA Hazardous Waste Storage permit is required for storage of wastes beyond 90 days.

**Pesticide Disposal:** Pesticide wastes are toxic. Improper disposal of excess pesticide or rinsate is a violation of Federal Law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.



Supplemental Labeling for Creosote (P1/P13)  
EPA Reg. No. 61470-1

Creosote (P1/P13) is registered only for pressure treatment of wood. Wood treaters must not knowingly pressure treat wood commodities that are not encompassed by the following use category table, which provides examples from the American Wood Protection Association (AWPA) Use Category System, as set forth in the most current edition of the AWPAs Book of Standards.

<b>AWPA Commodity Specification: Crossties and Switch Ties</b>	
<b>AWPA Use Category</b>	<b>Commodity Examples</b>
UC 4A, 4B, and 4C	Crossties and Switch Ties, produced from all wood species recognized by AWPAs for this commodity. Manufactured to meet AWPAs specifications.

<b>AWPA Commodity Specification: Posts</b>	
<b>AWPA Use Category</b>	<b>Commodity Examples</b>
UC4A	Posts, round, 1/2 and 1/4 round for highway construction (including guide, sign and sight) and farm fencing
UC4B	Posts, round, 1/2 and 1/4 round for highway construction (including guardrail posts, spacer blocks) and for road salt/brine storage Posts, round, 1/2 and 1/4 round for building construction Round posts, for structural members in agricultural uses

<b>AWPA Commodity Specification: Poles</b>	
<b>AWPA Use Category</b>	<b>Commodity Examples</b>
UC 4A, 4B, and 4C	Utility poles (including laminated) Poles for highway and agricultural construction, lighting, building structural use

Note: poles may be glue-or mechanically-laminated

<b>AWPA Commodity Specification: Piling</b>	
<b>AWPA Use Category</b>	<b>Commodity Examples</b>
UC 4C	Foundation and Land & Fresh Water Piles



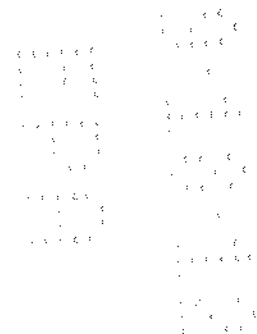
<b>AWPA Commodity Specification Marine: (Salt Water/Brackish Water) Applications</b>	
<b>AWPA Use Category</b>	<b>Commodity Examples</b>
UC 5A, 5B, and 5C	Bulkhead sheathing Lumber/timbers use, including timbers, cross bracing, and highway construction Piles for marine applications Plywood for bridge and marine construction

<b>AWPA Commodity Specification: Sawn Products</b>	
<b>AWPA Use Category</b>	<b>Commodity Examples</b>
UC 1, 2, and 3B	Guardrails for highway construction, including for golf course bridges meeting highway construction standards
UC4A	Lumber/timber for highway construction, including for golf course bridges meeting highway construction standards Crossarms Fence rail (farm/agricultural only, round, ¼ round, ½ round)
UC4B	Highway bridge decking (above ground, structural, subject to critical/severe decay) Road salt/brine storage Highway construction materials, including cribbing, lighting Piles (structural support in residential or business construction) Posts (sawn 4 sides) for highway construction, farm/agricultural structural use, spacer blocks, important building structural use Poles for structural building use Lumber/timbers (5 inches or greater) structural use; highway construction and cribbing; retaining walls for highway uses; building support structures Lumber/ Timbers (2 x 8 inch and/or 3 x 6 inch or greater) for marine use (out of water, ground contact, including salt water splash zone)
UC4C	Piles for structural support

<b>AWPA Commodity Specification: Wood Composites</b>	
<b>AWPA Use Category</b>	<b>Commodity Examples</b>
UC 1, 2, and 3B	Composite lumber for structural uses Glue- or nail-laminated structural members Plywood for agriculture, and farm use
UC 4A	PSL & LVL composite lumber for highway construction members (laminates) Plywood for bridge and farm/agricultural use
UC 4B	Plywood for marine use in salt water splash zones Plywood for road salt/brine storage, highway construction materials Composite lumber for bridge and highway construction Glue-laminate members (important structural or saltwater splash)
UC4C	Composite (PSL & LVL) lumber highway structural use Members (laminates) for critical structural uses

Note: laminates can be glued or mechanically fastened

Note: PSL = parallel strand lumber, LVL = laminated veneer lumber





**Technology Sciences Group Inc.**

1150 18<sup>th</sup> Street, Suite 1000  
Washington, DC 20036  
Direct: (202) 828-8967  
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E-Mail: MReynolds@TSGUSA.com

**Micah T. Reynolds**  
Regulatory Consultant

September 17, 2012

**RÜTGERS Germany GmbH**  
**Notification to Update Primary Brand Name for**  
**COAL TAR CREOSOTE; EPA Reg. No. 61470-1**

Ms. Jacqueline Campbell (PM-34)  
Antimicrobials Division (7504P)  
Office of Pesticide Programs  
U.S. Environmental Protection Agency  
Document Processing Center  
Room S-4900, One Potomac Yard  
2777 South Crystal Drive  
Arlington, Virginia 22202

Dear Jacqueline:

Technology Sciences Group, Inc., on behalf of RÜTGERS Germany GmbH (RÜTGERS), is submitting the enclosed notification to update the primary brand name of its product, Coal Tar Creosote, EPA Reg. No. 61470-1. The product was previously known as "KMG-B Coal Tar Creosote" and will continue to use that name as an alternate brand name. Please find enclosed the following documents supporting this notification:

- 1) EPA Notification Form (EPA Form 8570-1);
- 2) One copy of the revised label with changes marked;
- 3) Three clean copies of the revised label.

If you have any questions or require additional information or clarification, please do not hesitate to contact me by phone at (202) 828-8967 or by e-mail at [mreynolds@tsgusa.com](mailto:mreynolds@tsgusa.com).

Sincerely,


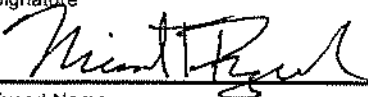
Regulatory Consultant to  
RÜTGERS Germany GmbH

Enclosures  
CC: W. Boenigk

Washington, D.C.  
1150 18<sup>th</sup> St., NW, Suite 1000  
Washington, D.C. 20036  
Phone: (202) 223-4392

California  
712 Fifth St., Suite A  
Davis, CA 95616  
Phone: (530) 757-1245

Canada  
275 Slater St., Suite 900  
Ottawa, Ontario K1P 5H9  
Phone: (613) 247-6285

 <div style="display: inline-block; text-align: center;">             United States  <b>Environmental Protection Agency</b>              Washington, DC 20460           </div>		<input type="checkbox"/> Registration <input type="checkbox"/> Amendment <input checked="" type="checkbox"/> Other	OPP Identifier Number
<b>Application for Pesticide – Section I</b>			
1. Company/Product Number <b>61470-1</b>		2. EPA Product Manager <b>Jacqueline Campbell</b>	
4. Company/Product (Name) <b>Coal Tar Creosote</b>		PM# <b>34</b>	3. Proposed Classification <input type="checkbox"/> None <input checked="" type="checkbox"/> Restricted
5. Name And Address Of Applicant (Include ZIP Code) <b>RÜTGERS Germany GmbH</b> <b>Kekulestrasse 30</b> <b>44579 Castrop-Rauxel, Germany</b>  <input type="checkbox"/> Check if this is a new address		6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to:  EPA Reg. No. _____  Product Name _____	
<b>Section II</b>			
<input type="checkbox"/> Amendment – Explain below. <span style="margin-left: 200px;"><input type="checkbox"/> Final Printed labels in response to Agency letter dated _____</span> <input type="checkbox"/> Resubmission in response to Agency letter dated _____ <span style="margin-left: 200px;"><input type="checkbox"/> "Me Too" Application.</span> <input checked="" type="checkbox"/> Notification – Explain below. <span style="margin-left: 200px;"><input type="checkbox"/> Other – Explain Below.</span>			
<b>Explanation:</b> Use additional page(s) if necessary. (For section I and Section II.) <b>This Notification is to update and replace the primary brand name of the product from "KMG-B Coal Tar Creosote" to "Coal Tar Creosote". KMG-B Coal Tar Creosote is retained as an alternate brand name.</b> This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA. <b>Please confirm receipt with Micah Reynolds: mreynolds@tsgusa.com, via phone (202) 828-8967, or via fax (202) 872-0745.</b>			
<b>Section III</b>			
1. Material This Product Will Be Packaged In:			
Child Resistant Packaging <input type="checkbox"/> Yes* <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No  If "Yes" No. per Unit Packaging wgt. Container	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No  If "Yes" No. per Unit Packaging wgt. Container	2. Type of Container <input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(S) Retail Container	5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithographed <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled <span style="margin-left: 100px;"><input type="checkbox"/> Other _____</span>			
<b>Section IV</b>			
1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)			
Name <b>Micah T. Reynolds, Technology Sciences Group, Inc.</b>		Title <b>Regulatory Consultant</b>	Telephone No. (Include Area Code) <b>(202) 828-8967</b>
<b>Certification</b> I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.			6. Date Application Received (Stamped)
2. Signature 		3. Title <b>Regulatory Consultant to RÜTGERS Germany GmbH</b>	
4. Typed Name <b>Micah T. Reynolds</b>		5. Date <b>September 17, 2012</b>	

# Receipt for Section 3

S: 923935

Resubmission: ☐ Yes ☒ No

Regulatory Type: Product Registration - Section 3

Fee For Service: ☐ Yes ☒ No

Application Type: Notification

Company: 61470 RUTGERS GERMANY GMBH V

Risk Manager: Antimicrobials Division, Risk Management Team 34

Product #: 61470-1 Product Name: KMG-B COAL TAR CREOSOTE

Override:

Me Too Section3: Me Too Product Name:

Application Date: 17-Sep-2012 

OPP Rec'd Date: 19-Sep-2012 

Front End Date: 19-Sep-2012 

Risk Manager Send Date: 19-Sep-2012 

FFS Due Date:

Negotiated Due Date:

OPP Target Date:

Fast Track: ☐

New Ingredient: ☐

Receipt Description:

Notification is to update and replace the primary brand name. This notification is consistent with provisions of PR Notice 98-10

Form A: ☐

Signature Date:

Form B: ☐

Signature Date:

Print Letter

Enter More Information

Tracking

Receipt Content

Des

Paper Label

View/Edit

New Ingredient

Request Date:

New Ingredient

Received Date:

34

# Material to be added to an e-Jacket/Jacket

Reg. No. 61470-1

Description: \_\_\_\_\_

1. ☐ Placement within the e-Jacket/jacket:
- ☐ Default: (chronological, top = newest)
  - ☐ File Location: (PDF page number, i.e., "before page 45")
- \_\_\_\_\_
- \_\_\_\_\_

2. ☒ Send to Data Extraction contractors this material:

- ☒ Newly stamped accepted label
- ☐ Notification
- ☐ New CSF
- ☐ Other: \_\_\_\_\_

3. Attach this coversheet to the top of the material or jacket. It must be well organized and clipped together, **NOT STAPLED**. Then give the material with this coversheet to staff in the Information Services Center (Room S-4900).

Reviewer's Name: Jaqueline Campbell-McFarlane

Phone: \_\_\_\_\_ Division: AD

Date: 9/2/2010



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460

SEP - 2 2010

OFFICE OF  
PREVENTION, PESTICIDES  
AND TOXIC SUBSTANCES

Dr. Hubert O'Neal  
Rutgers Germany GmbH  
Kekulestr. 30  
Castrop-Rauxel 44579  
Germany

Subject: KMG-B Coal Tar Creosote  
EPA Registration Number: 61470-1  
Amendment Date: July 1, 2010  
EPA Receipt Date: July 4, 2010

Dear Dr. O'Neal:

The following amendment submitted in connection with registration under FIFRA, as amended, is acceptable.

**Proposed Amendment**

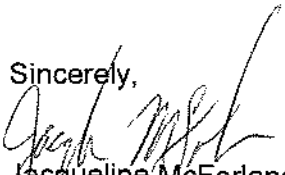
- Correct physical address and primary brand name
- Final printed labels

**General Comments**

A stamped label with conditions is enclosed for your records. Submit a copy of your final printed label before distributing or selling the product bearing the revised labeling.

Should you have any questions or comments concerning this letter, you may contact me by telephone at (703) 308-6416 or by e-mail at [campbell-mcfarlane.jacqueline@epa.gov](mailto:campbell-mcfarlane.jacqueline@epa.gov). When submitting information or data in response to this letter, a copy of this letter should accompany the submission to facilitate processing.

Sincerely,

  
Jacqueline McFarlane  
Product Manager (34)  
Regulatory Management Branch II  
Antimicrobials Division (7510P)

CONCURRENCES							
SYMBOL	Enclosure: EPA stamped label						
SURNAME							
DATE							

**RESTRICTED USE PESTICIDE**

Due to chronic toxicity in animal studies

For sale to and use only by Certified Applicators or persons under their direct supervision and only for those uses covered by the Certified Applicator's certification.

# KMG-B COAL TAR CREOSOTE

FOR PRESSURE TREATMENT OF WOOD

**Active Ingredient:**

Coal Tar Creosote (AWPA P1/P13)

98.0 %

CAS No. 8001-58-9

**Inert Ingredients**

2.0 %

**Total**

**100.0 %**

## WARNING

See [side] [back] panel for additional precautionary statements, [First Aid], and complete Directions for Use

EPA Reg. No. 61470-1

EPA Est. No.

Net contents \_\_\_\_\_ gallons

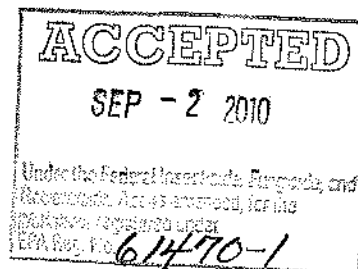
**Manufactured by:**

RÜTGERS Germany GmbH

Kekuléstr. 30

Castrop- Rauxel 44579

Germany





<b>FIRST AID</b>	
If in eyes	<ul style="list-style-type: none"> <li>• Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li> <li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
If swallowed	<ul style="list-style-type: none"> <li>• Call poison control center or doctor immediately for treatment advice.</li> <li>• Do not induce vomiting unless told to do so by the poison control center or doctor.</li> <li>• Do not give anything by mouth to an unconscious person.</li> </ul>
If on skin or clothing	<ul style="list-style-type: none"> <li>• Take off contaminated clothing.</li> <li>• Rinse skin immediately with plenty of water for 15-20 minutes.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
If inhaled	<ul style="list-style-type: none"> <li>• Move person to fresh air</li> <li>• If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible.</li> <li>• Call a poison control center or doctor for further treatment advice.</li> </ul>
<b>HOTLINE NUMBER</b>	
Have the product label or MSDS with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-800-424-9300 for emergency medical treatment information.	
<b>NOTE TO PHYSICIAN</b>	
Probable mucosal damage may contraindicate the use of gastric lavage. Vomiting may cause aspiration pneumonia.	

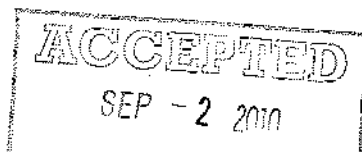
### **PRECAUTIONARY STATEMENTS**

#### **HAZARDS TO HUMANS AND DOMESTIC ANIMALS**

**WARNING:** Causes substantial but temporary eye injury. Harmful if swallowed or absorbed through skin. Avoid breathing vapors of heated material. Do not get in eyes, on skin or on clothing. Wear protective eye wear (goggles, protective glasses or face shield). Wash thoroughly after skin contact, before eating, drinking, chewing gum, using tobacco products, or using restrooms. Remove and wash contaminated clothing before reuse. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals.

Prolonged and repeated skin exposure over many years in the absence of recommended hygiene practices may lead to changes in skin pigmentation, benign skin growth and in some cases, result in skin cancer. The inhalation exposure limit to creosote vapor is 0.2 mg/m<sup>3</sup> OSHA PEL (\* Hour TWA) for Coal Tar Pitch Volatiles (benzene soluble fraction) as specified in 29 CFR 1910.1002. Prolonged or repeated inhalation exposure above the limit may lead to respiratory system effects such as inflammation and possibly changes in liver, thyroid and blood elements.

See side panel for additional precautions and First Aid.



### **PERSONAL PROTECTIVE EQUIPMENT (PPE)**

All personnel handling treated wood or handling treating equipment (including poles/hooks used to retrieve charge cables) that has come into contact with preservative must wear the following PPE:

- Washable or disposable coveralls or long-sleeved shirt and long pants,
- Chemical resistant gloves, and
- Socks plus industrial grade safety work boots with chemical resistant soles.

All personnel cleaning or maintaining the treatment cylinder gasket/equipment or working with concentrate or wood treatment preservative must wear the following PPE:

- Washable or disposable coveralls or long-sleeved shirt and long pants,
- Chemical resistant gloves,
- Socks plus industrial grade safety work boots with chemical resistant soles, and
- A full face shield.

In the event of equipment malfunction, or for door spacer placement, all personnel located within 15 feet of the cylinder opening prior to cylinder ventilation must wear the following PPE:

- Washable or disposable coveralls or long-sleeved shirt and long pants,
- Chemical resistant gloves,
- Socks plus industrial grade safety work boots with chemical resistant soles, and
- A properly fitting half mask elastomeric respirator with appropriate cartridges and/or filters.

Entry to confined spaces is regulated by Federal and/or State Occupational Safety and Health Programs. Compliance is mandated by law. Individuals who enter pressure treatment cylinders or other related equipment that is contaminated with the wood treatment preservative (e.g. cylinders that are not free of treatment preservative or preservative storage tanks) must wear protective clothing and/or equipment as required by Federal and/or State Occupational Safety and Health Compliance laws.

### **USER SAFETY REQUIREMENTS**

Personnel must leave aprons, protective coveralls, chemical resistant gloves, work footwear, and any other material contaminated with preservative at the treatment facility.

Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables exist, use detergent and hot water. Keep and wash PPE separately from other laundry.

Discard clothing and other absorbent material that have been drenched or heavily contaminated with the product's concentrate. Do not reuse them.

Eating, drinking, smoking are prohibited in the treatment cylinder load-out area, drip pad area, and engineering control room of the wood treatment facilities. EXCEPTION: Where treating operator control rooms are isolated from the treating cylinders, drip pad, and work tanks, eating, drinking, and smoking (depending on local restrictions) are permitted.

Users must:

- Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet,
- Remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

## ENVIRONMENTAL HAZARDS

This product is toxic to aquatic organisms. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or other waters unless in accordance with the requirements of a National Pollution Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

## DIRECTIONS FOR USE

**It is a violation of federal law to use this product in a manner inconsistent with its labeling.**

For terrestrial and aquatic nonfood wood/wood structure protection treatments via pressure methods for utility poles/crossarms, railroad ties, switch ties, bridge timbers, fence and guardrail posts, foundation timbers, marine and foundation round piles, sawn lumber and timber products, and exterior structural composite glue laminated wood and plywood products. Treated wood is intended for exterior/outdoor uses only.

## APPLICATION

Engineering Controls to be put in place as of December 31, 2013:

- For pressure treatment with creosote, automatic, remotely operated devices must be used to open, close, lock, and unlock cylinder doors,
- Mechanical methods must be used to place/remove bridge rails

General Instructions for Creosote Pressure Treatment:

- Cylinder openings and door pits must use grating and additional measures such as sumps, dams or other devices which prevent or remove spillage of the preservative.
- Personnel must not directly handle the charge tables, poles or hooks used to retrieve charge cables, or other equipment that has contacted the preservative without wearing chemical resistant gloves.
- In the event of equipment malfunction, or to place the spacer to hold the door open during venting, only personnel wearing specified PPE are permitted within 15 feet of the cylinder opening prior to ventilation.

The Treatment Process:

- A final vacuum must be used to remove excess preservative from the wood. The final vacuum must attain a vacuum equal to or greater than the initial vacuum. This vacuum must be held for an appropriate time period based on wood species, retention levels, and commodity treated to remove excess preservative from the wood.
- After creosote treatment, wood must be moved to a drip pad capable of recovering excess preservative until the wood is drip free.



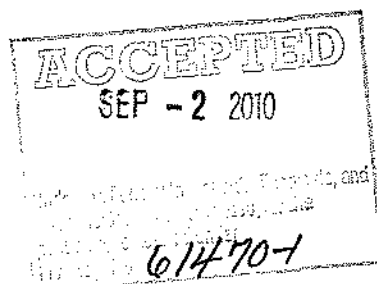
#### Post-Treatment Procedures:

Creosote-treated wood intended for use in aquatic or marine environments must be processed using one of the following alternative procedures, as determined by the treater:

- **Expansion Bath** – Following the pressure period, creosote should be heated from 10 - 20 degrees F. above press temperatures (consistent with the preservative and species temperature limitations set by AWWPA) for a minimum of one hour. Pump creosote back to storage and apply a minimum vacuum of 22 inches of Hg (adjusted for location elevation) for a minimum of two hours.
- **Steaming** – Following the pressure period, and after the creosote has been pumped back to the work tank, a vacuum must be applied for a minimum of two hours at not less than 22 inches of Hg (adjusted for location elevation) to recover excess preservative. Release vacuum back to atmospheric pressure and steam for two hours for lumber and timbers and three hours for round piling. Maximum temperature during this process should not exceed 240 degrees F. Apply a second vacuum for a minimum of four hours at 22 inches of Hg (adjusted for location elevation).
- **Double Vacuuming** – Following the pressure period and after the creosote has been pumped back to the work tank, a vacuum must be applied for a minimum of one hour at not less than 22 inches of Hg (adjusted for location elevation) to recover excess preservative. Release vacuum back to atmospheric pressure and then follow with a second vacuum of not less than 22 inches of Hg (adjusted for location elevation) for a minimum period of three hours.

Ventilation Process (at conclusion of treatment) to be put in place as of December 31, 2013:

- The cylinder must be ventilated by purging the post-treatment cylinder through fresh air exchange. The ventilation process is considered complete after a minimum of 2 volume exchanges based on the empty treatment cylinder volume. The exhaust pipe of the vacuum system or any air moving device utilized in conducting the air purge must terminate into a containment vessel such as a treating solution work tank or water/effluent tank.
- The ventilation process may be accomplished by one of the following methods: 1) activating an air purge system that operates while the cylinder door remains closed; or 2) using a device to open and hold open the cylinder door (no more than 6 inches) to allow adequate ventilation and activating the vacuum pump.
- If the second method is utilized, at the conclusion of the treatment, no personnel may be located within 15 feet of the cylinder when open (cracked) until the cylinder has been ventilated.
- After ventilation is complete, the cylinder door may be completely opened.

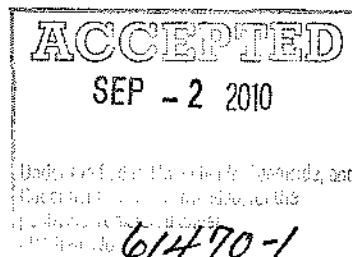


### STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

**Pesticide Storage:** In case of spillage, absorb (with sand, earth, etc.) and dispose of in accordance with applicable Federal, State and local regulations. Contaminated materials must be handled and managed as a RCRA Hazardous Waste and treated before disposal in an approved landfill. This waste is identified by the EPA as a U051 hazardous waste and must meet the treatment standards specified in 40 CFR 268 Subpart D. An RCRA Hazardous Waste Storage permit is required for storage of wastes beyond 90 days.

**Pesticide Disposal:** Pesticide wastes are toxic. Improper disposal of excess pesticide or rinsate is a violation of Federal Law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.



Supplemental Labeling for Creosote (P1/P13)  
EPA Reg. No. 61470-1

Creosote (P1/P13) is registered only for pressure treatment of wood. Wood treaters must not knowingly pressure treat wood commodities that are not encompassed by the following use category table, which provides examples from the American Wood Protection Association (AWPA) Use Category System, as set forth in the most current edition of the AWPAs Book of Standards.

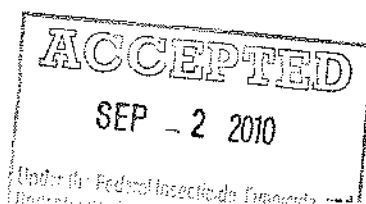
<b>AWPA Commodity Specification: Crossties and Switch Ties</b>	
<b>AWPA Use Category</b>	<b>Commodity Examples</b>
UC 4A, 4B, and 4C	Crossties and Switch Ties, produced from all wood species recognized by AWPAs for this commodity. Manufactured to meet AWPAs specifications.

<b>AWPA Commodity Specification: Posts</b>	
<b>AWPA Use Category</b>	<b>Commodity Examples</b>
UC4A	Posts, round, 1/2 and 1/4 round for highway construction (including guide, sign and sight) and farm fencing
UC4B	Posts, round, 1/2 and 1/4 round for highway construction (including guardrail posts, spacer blocks) and for road salt/brine storage Posts, round, 1/2 and 1/4 round for building construction Round posts, for structural members in agricultural uses

<b>AWPA Commodity Specification: Poles</b>	
<b>AWPA Use Category</b>	<b>Commodity Examples</b>
UC 4A, 4B, and 4C	Utility poles (including laminated) Poles for highway and agricultural construction, lighting, building structural use

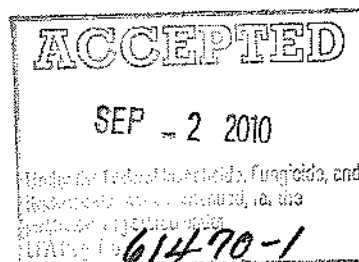
Note: poles may be glue-or mechanically-laminated

<b>AWPA Commodity Specification: Piling</b>	
<b>AWPA Use Category</b>	<b>Commodity Examples</b>
UC 4C	Foundation and Land & Fresh Water Piles



<b>AWPA Commodity Specification Marine: (Salt Water/Brackish Water) Applications</b>	
<b>AWPA Use Category</b>	<b>Commodity Examples</b>
UC 5A, 5B, and 5C	Bulkhead sheathing Lumber/timbers use, including timbers, cross bracing, and highway construction Piles for marine applications Plywood for bridge and marine construction

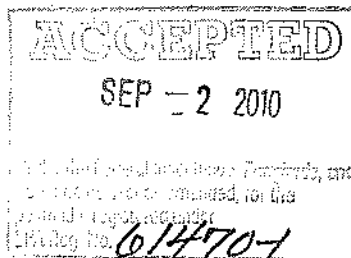
<b>AWPA Commodity Specification: Sawn Products</b>	
<b>AWPA Use Category</b>	<b>Commodity Examples</b>
UC I, 2, and 3B	Guardrails for highway construction, including for golf course bridges meeting highway construction standards
UC4A	Lumber/timber for highway construction, including for golf course bridges meeting highway construction standards Crossarms Fence rail (farm/agricultural only, round, ¼ round, ½ round)
UC4B	Highway bridge decking (above ground, structural, subject to critical/severe decay) Road salt/brine storage Highway construction materials, including cribbing, lighting Piles (structural support in residential or business construction) Posts (sawn 4 sides) for highway construction, farm/agricultural structural use, spacer blocks, important building structural use Poles for structural building use Lumber/timbers (5 inches or greater) structural use; highway construction and cribbing; retaining walls for highway uses; building support structures Lumber/ Timbers (2 x 8 inch and/or 3 x 6 inch or greater) for marine use (out of water, ground contact, including salt water splash zone)
UC4C	Piles for structural support



<b>AWPA Commodity Specification: Wood Composites</b>	
<b>AWPA Use Category</b>	<b>Commodity Examples</b>
UC 1, 2, and 3B	Composite lumber for structural uses Glue- or nail-laminated structural members Plywood for agriculture, and farm use
UC 4A	PSL & LVL composite lumber for highway construction members (laminates) Plywood for bridge and farm/agricultural use
UC 4B	Plywood for marine use in salt water splash zones Plywood for road salt/brine storage, highway construction materials Composite lumber for bridge and highway construction Glue-laminate members (important structural or saltwater splash)
UC4C	Composite (PSL & LVL) lumber highway structural use Members (laminates) for critical structural uses

Note: laminates can be glued or mechanically fastened

Note: PSL = parallel strand lumber, LVL = laminated veneer lumber





**RESTRICTED USE PESTICIDE**

Due to chronic toxicity in animal studies

For sale to and use only by Certified Applicators or persons under their direct supervision and only for those uses covered by the Certified Applicator's certification.

# KMG-B COAL TAR CREOSOTE

FOR PRESSURE TREATMENT OF WOOD

**Active Ingredient:**

Coal Tar Creosote (AWPA P1/P13)

98.0 %

CAS No. 8001-58-9

**Inert Ingredients**

2.0 %

**Total**

**100.0 %**

## WARNING

See [side] [back] panel for additional precautionary statements, [First Aid], and complete Directions for Use

EPA Reg. No. 61470-1

EPA Est. No.

Net contents \_\_\_\_\_ gallons

**Manufactured by:**

RÜTGERS Germany GmbH

Kekuléstr. 30

Castrop- Rauxel 44579

Germany

<b>FIRST AID</b>	
If in eyes	<ul style="list-style-type: none"> <li>• Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li> <li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
If swallowed	<ul style="list-style-type: none"> <li>• Call poison control center or doctor immediately for treatment advice.</li> <li>• Do not induce vomiting unless told to do so by the poison control center or doctor.</li> <li>• Do not give anything by mouth to an unconscious person.</li> </ul>
If on skin or clothing	<ul style="list-style-type: none"> <li>• Take off contaminated clothing.</li> <li>• Rinse skin immediately with plenty of water for 15-20 minutes.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
If inhaled	<ul style="list-style-type: none"> <li>• Move person to fresh air</li> <li>• If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible.</li> <li>• Call a poison control center or doctor for further treatment advice.</li> </ul>
<b>HOTLINE NUMBER</b>	
Have the product label or MSDS with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-800-424-9300 for emergency medical treatment information.	
<b>NOTE TO PHYSICIAN</b>	
Probable mucosal damage may contraindicate the use of gastric lavage. Vomiting may cause aspiration pneumonia.	

### **PRECAUTIONARY STATEMENTS**

#### **HAZARDS TO HUMANS AND DOMESTIC ANIMALS**

**WARNING:** Causes substantial but temporary eye injury. Harmful if swallowed or absorbed through skin. Avoid breathing vapors of heated material. Do not get in eyes, on skin or on clothing. Wear protective eye wear (goggles, protective glasses or face shield). Wash thoroughly after skin contact, before eating, drinking, chewing gum, using tobacco products, or using restrooms. Remove and wash contaminated clothing before reuse. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals.

Prolonged and repeated skin exposure over many years in the absence of recommended hygiene practices may lead to changes in skin pigmentation, benign skin growth and in some cases, result in skin cancer. The inhalation exposure limit to creosote vapor is 0.2 mg/m<sup>3</sup> OSHA PEL (\* Hour TWA) for Coal Tar Pitch Volatiles (benzene soluble fraction) as specified in 29 CFR 1910.1002. Prolonged or repeated inhalation exposure above the limit may lead to respiratory system effects such as inflammation and possibly changes in liver, thyroid and blood elements.

See side panel for additional precautions and First Aid.

### **PERSONAL PROTECTIVE EQUIPMENT (PPE)**

All personnel handling treated wood or handling treating equipment (including poles/hooks used to retrieve charge cables) that has come into contact with preservative must wear the following PPE:

- Washable or disposable coveralls or long-sleeved shirt and long pants,
- Chemical resistant gloves, and
- Socks plus industrial grade safety work boots with chemical resistant soles.

All personnel cleaning or maintaining the treatment cylinder gasket/equipment or working with concentrate or wood treatment preservative must wear the following PPE:

- Washable or disposable coveralls or long-sleeved shirt and long pants,
- Chemical resistant gloves,
- Socks plus industrial grade safety work boots with chemical resistant soles, and
- A full face shield.

In the event of equipment malfunction, or for door spacer placement, all personnel located within 15 feet of the cylinder opening prior to cylinder ventilation must wear the following PPE:

- Washable or disposable coveralls or long-sleeved shirt and long pants,
- Chemical resistant gloves,
- Socks plus industrial grade safety work boots with chemical resistant soles, and
- A properly fitting half mask elastomeric respirator with appropriate cartridges and/or filters.

Entry to confined spaces is regulated by Federal and/or State Occupational Safety and Health Programs. Compliance is mandated by law. Individuals who enter pressure treatment cylinders or other related equipment that is contaminated with the wood treatment preservative (e.g. cylinders that are not free of treatment preservative or preservative storage tanks) must wear protective clothing and/or equipment as required by Federal and/or State Occupational Safety and Health Compliance laws.

### **USER SAFETY REQUIREMENTS**

Personnel must leave aprons, protective coveralls, chemical resistant gloves, work footwear, and any other material contaminated with preservative at the treatment facility.

Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables exist, use detergent and hot water. Keep and wash PPE separately from other laundry.

Discard clothing and other absorbent material that have been drenched or heavily contaminated with the product's concentrate. Do not reuse them.

Eating, drinking, smoking are prohibited in the treatment cylinder load-out area, drip pad area, and engineering control room of the wood treatment facilities. **EXCEPTION:** Where treating operator control rooms are isolated from the treating cylinders, drip pad, and work tanks, eating, drinking, and smoking (depending on local restrictions) are permitted.

Users must:

- Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet,
- Remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

## ENVIRONMENTAL HAZARDS

This product is toxic to aquatic organisms. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or other waters unless in accordance with the requirements of a National Pollution Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

## DIRECTIONS FOR USE

**It is a violation of federal law to use this product in a manner inconsistent with its labeling.**

For terrestrial and aquatic nonfood wood/wood structure protection treatments via pressure methods for utility poles/crossarms, railroad ties, switch ties, bridge timbers, fence and guardrail posts, foundation timbers, marine and foundation round piles, sawn lumber and timber products, and exterior structural composite glue laminated wood and plywood products. Treated wood is intended for exterior/outdoor uses only.

## APPLICATION

Engineering Controls to be put in place as of December 31, 2013:

- For pressure treatment with creosote, automatic, remotely operated devices must be used to open, close, lock, and unlock cylinder doors,
- Mechanical methods must be used to place/remove bridge rails

General Instructions for Creosote Pressure Treatment:

- Cylinder openings and door pits must use grating and additional measures such as sumps, dams or other devices which prevent or remove spillage of the preservative.
- Personnel must not directly handle the charge tables, poles or hooks used to retrieve charge cables, or other equipment that has contacted the preservative without wearing chemical resistant gloves.
- In the event of equipment malfunction, or to place the spacer to hold the door open during venting, only personnel wearing specified PPE are permitted within 15 feet of the cylinder opening prior to ventilation.

The Treatment Process:

- A final vacuum must be used to remove excess preservative from the wood. The final vacuum must attain a vacuum equal to or greater than the initial vacuum. This vacuum must be held for an appropriate time period based on wood species, retention levels, and commodity treated to remove excess preservative from the wood.
- After creosote treatment, wood must be moved to a drip pad capable of recovering excess preservative until the wood is drip free.

#### Post-Treatment Procedures:

Creosote-treated wood intended for use in aquatic or marine environments must be processed using one of the following alternative procedures, as determined by the treater:

- **Expansion Bath** – Following the pressure period, creosote should be heated from 10 - 20 degrees F. above press temperatures (consistent with the preservative and species temperature limitations set by AWWPA) for a minimum of one hour. Pump creosote back to storage and apply a minimum vacuum of 22 inches of Hg (adjusted for location elevation) for a minimum of two hours.
- **Steaming** – Following the pressure period, and after the creosote has been pumped back to the work tank, a vacuum must be applied for a minimum of two hours at not less than 22 inches of Hg (adjusted for location elevation) to recover excess preservative. Release vacuum back to atmospheric pressure and steam for two hours for lumber and timbers and three hours for round piling. Maximum temperature during this process should not exceed 240 degrees F. Apply a second vacuum for a minimum of four hours at 22 inches of Hg (adjusted for location elevation).
- **Double Vacuuming** – Following the pressure period and after the creosote has been pumped back to the work tank, a vacuum must be applied for a minimum of one hour at not less than 22 inches of Hg (adjusted for location elevation) to recover excess preservative. Release vacuum back to atmospheric pressure and then follow with a second vacuum of not less than 22 inches of Hg (adjusted for location elevation) for a minimum period of three hours.

Ventilation Process (at conclusion of treatment) to be put in place as of December 31, 2013:

- The cylinder must be ventilated by purging the post-treatment cylinder through fresh air exchange. The ventilation process is considered complete after a minimum of 2 volume exchanges based on the empty treatment cylinder volume. The exhaust pipe of the vacuum system or any air moving device utilized in conducting the air purge must terminate into a containment vessel such as a treating solution work tank or water/effluent tank.
- The ventilation process may be accomplished by one of the following methods: 1) activating an air purge system that operates while the cylinder door remains closed; or 2) using a device to open and hold open the cylinder door (no more than 6 inches) to allow adequate ventilation and activating the vacuum pump.
- If the second method is utilized, at the conclusion of the treatment, no personnel may be located within 15 feet of the cylinder when open (cracked) until the cylinder has been ventilated.
- After ventilation is complete, the cylinder door may be completely opened.

### STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

**Pesticide Storage:** In case of spillage, absorb (with sand, earth, etc.) and dispose of in accordance with applicable Federal, State and local regulations. Contaminated materials must be handled and managed as a RCRA Hazardous Waste and treated before disposal in an approved landfill. This waste is identified by the EPA as a U051 hazardous waste and must meet the treatment standards specified in 40 CFR 268 Subpart D. An RCRA Hazardous Waste Storage permit is required for storage of wastes beyond 90 days.

**Pesticide Disposal:** Pesticide wastes are toxic. Improper disposal of excess pesticide or rinsate is a violation of Federal Law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

Supplemental Labeling for Creosote (P1/P13)  
EPA Reg. No. 61470-1

Creosote (P1/P13) is registered only for pressure treatment of wood. Wood treaters must not knowingly pressure treat wood commodities that are not encompassed by the following use category table, which provides examples from the American Wood Protection Association (AWPA) Use Category System, as set forth in the most current edition of the AWPAs Book of Standards.

<b>AWPA Commodity Specification: Crossties and Switch Ties</b>	
<b>AWPA Use Category</b>	<b>Commodity Examples</b>
UC 4A, 4B, and 4C	Crossties and Switch Ties, produced from all wood species recognized by AWPAs for this commodity. Manufactured to meet AWPAs specifications.

<b>AWPA Commodity Specification: Posts</b>	
<b>AWPA Use Category</b>	<b>Commodity Examples</b>
UC4A	Posts, round, 1/2 and 1/4 round for highway construction (including guide, sign and sight) and farm fencing
UC4B	Posts, round, 1/2 and 1/4 round for highway construction (including guardrail posts, spacer blocks) and for road salt/brine storage Posts, round, 1/2 and 1/4 round for building construction Round posts, for structural members in agricultural uses

<b>AWPA Commodity Specification: Poles</b>	
<b>AWPA Use Category</b>	<b>Commodity Examples</b>
UC 4A, 4B, and 4C	Utility poles (including laminated) Poles for highway and agricultural construction, lighting, building structural use

Note: poles may be glue-or mechanically-laminated

<b>AWPA Commodity Specification: Piling</b>	
<b>AWPA Use Category</b>	<b>Commodity Examples</b>
UC 4C	Foundation and Land & Fresh Water Piles

<b>AWPA Commodity Specification Marine: (Salt Water/Brackish Water) Applications</b>	
<b>AWPA Use Category</b>	<b>Commodity Examples</b>
UC 5A, 5B, and 5C	Bulkhead sheathing Lumber/timbers use, including timbers, cross bracing, and highway construction Piles for marine applications Plywood for bridge and marine construction

<b>AWPA Commodity Specification: Sawn Products</b>	
<b>AWPA Use Category</b>	<b>Commodity Examples</b>
UC 1, 2, and 3B	Guardrails for highway construction, including for golf course bridges meeting highway construction standards
UC4A	Lumber/timber for highway construction, including for golf course bridges meeting highway construction standards Crossarms Fence rail (farm/agricultural only, round, ¼ round, ½ round)
UC4B	Highway bridge decking (above ground, structural, subject to critical/severe decay) Road salt/brine storage Highway construction materials, including cribbing, lighting Piles (structural support in residential or business construction) Posts (sawn 4 sides) for highway construction, farm/agricultural structural use, spacer blocks, important building structural use Poles for structural building use Lumber/timbers (5 inches or greater) structural use; highway construction and cribbing; retaining walls for highway uses; building support structures Lumber/ Timbers (2 x 8 inch and/or 3 x 6 inch or greater) for marine use (out of water, ground contact, including salt water splash zone)
UC4C	Piles for structural support



<b>AWPA Commodity Specification: Wood Composites</b>	
<b>AWPA Use Category</b>	<b>Commodity Examples</b>
UC 1, 2, and 3B	Composite lumber for structural uses Glue- or nail-laminated structural members Plywood for agriculture, and farm use
UC 4A	PSL & LVL composite lumber for highway construction members (laminates) Plywood for bridge and farm/agricultural use
UC 4B	Plywood for marine use in salt water splash zones Plywood for road salt/brine storage, highway construction materials Composite lumber for bridge and highway construction Glue-laminate members (important structural or saltwater splash)
UC4C	Composite (PSL & LVL) lumber highway structural use Members (laminates) for critical structural uses

Note: laminates can be glued or mechanically fastened

Note: PSL = parallel strand lumber, LVL = laminated veneer lumber

# Material to be added to an e-Jacket/Jacket

Reg. No. 61470-1

Description: \_\_\_\_\_

1. ☐ Placement within the e-Jacket/jacket:
- ☐ Default: (chronological, top = newest)
  - ☐ File Location: (PDF page number, i.e., "before page 45")
- \_\_\_\_\_
- \_\_\_\_\_

2. ☒ Send to Data Extraction contractors this material:

- ☒ Newly stamped accepted label
- ☐ Notification
- ☐ New CSF
- ☐ Other: \_\_\_\_\_

3. Attach this coversheet to the top of the material or jacket. It must be well organized and clipped together, **NOT STAPLED**. Then give the material with this coversheet to staff in the Information Services Center (Room S-4900).

Reviewer's Name: Jacqueline Campbell-McEneaney

Phone: \_\_\_\_\_ Division: AD

Date: 9/2/2016



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460

SEP - 2 2010

OFFICE OF  
PREVENTION, PESTICIDES  
AND TOXIC SUBSTANCES

Dr. Hubert O'Neal  
Rutgers Germany GmbH  
Kekulestr. 30  
Castrop-Rauxel 44579  
Germany

**FILE COPY**

Subject: KMG-B Coal Tar Creosote  
EPA Registration Number: 61470-1  
Amendment Date: July 1, 2010  
EPA Receipt Date: July 4, 2010

Dear Dr. O'Neal:

The following amendment submitted in connection with registration under FIFRA, as amended, is acceptable.

**Proposed Amendment**

- Correct physical address and primary brand name
- Final printed labels

**General Comments**

A stamped label with conditions is enclosed for your records. Submit a copy of your final printed label before distributing or selling the product bearing the revised labeling.

Should you have any questions or comments concerning this letter, you may contact me by telephone at (703) 308-6416 or by e-mail at [campbell-mcfarlane.jacqueline@epa.gov](mailto:campbell-mcfarlane.jacqueline@epa.gov). When submitting information or data in response to this letter, a copy of this letter should accompany the submission to facilitate processing.

Sincerely,

Jacqueline McFarlane  
Product Manager (34)  
Regulatory Management Branch II  
Antimicrobials Division (7510P)

Enclosure: EPA stamped label

**RESTRICTED USE PESTICIDE**

Due to chronic toxicity in animal studies

For sale to and use only by Certified Applicators or persons under their direct supervision and only for those uses covered by the Certified Applicator's certification.

# KMG-B COAL TAR CREOSOTE

FOR PRESSURE TREATMENT OF WOOD

**Active Ingredient:**

Coal Tar Creosote (AWPA P1/P13)

98.0 %

CAS No. 8001-58-9

**Inert Ingredients**

2.0 %

**Total**

**100.0 %**

## WARNING

See [side] [back] panel for additional precautionary statements, [First Aid], and complete Directions for Use

EPA Reg. No. 61470-1

EPA Est. No.

Net contents \_\_\_\_\_ gallons

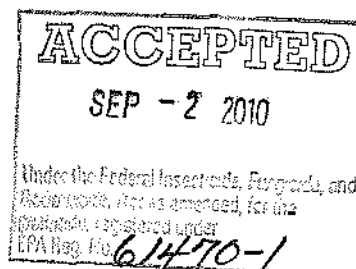
**Manufactured by:**

RÜTGERS Germany GmbH

Kekuléstr. 30

Castrop-Rauxel 44579

Germany



<b>FIRST AID</b>	
If in eyes	<ul style="list-style-type: none"> <li>• Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li> <li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
If swallowed	<ul style="list-style-type: none"> <li>• Call poison control center or doctor immediately for treatment advice.</li> <li>• Do not induce vomiting unless told to do so by the poison control center or doctor.</li> <li>• Do not give anything by mouth to an unconscious person.</li> </ul>
If on skin or clothing	<ul style="list-style-type: none"> <li>• Take off contaminated clothing.</li> <li>• Rinse skin immediately with plenty of water for 15-20 minutes.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
If inhaled	<ul style="list-style-type: none"> <li>• Move person to fresh air</li> <li>• If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible.</li> <li>• Call a poison control center or doctor for further treatment advice.</li> </ul>
<b>HOTLINE NUMBER</b>	
Have the product label or MSDS with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-800-424-9300 for emergency medical treatment information.	
<b>NOTE TO PHYSICIAN</b>	
Probable mucosal damage may contraindicate the use of gastric lavage. Vomiting may cause aspiration pneumonia.	

### **PRECAUTIONARY STATEMENTS**

#### **HAZARDS TO HUMANS AND DOMESTIC ANIMALS**

**WARNING:** Causes substantial but temporary eye injury. Harmful if swallowed or absorbed through skin. Avoid breathing vapors of heated material. Do not get in eyes, on skin or on clothing. Wear protective eye wear (goggles, protective glasses or face shield). Wash thoroughly after skin contact, before eating, drinking, chewing gum, using tobacco products, or using restrooms. Remove and wash contaminated clothing before reuse. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals.

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See side panel for additional precautions and First Aid.

### **PERSONAL PROTECTIVE EQUIPMENT (PPE)**

All personnel handling treated wood or handling treating equipment (including poles/hooks used to retrieve charge cables) that has come into contact with preservative must wear the following PPE:

- Washable or disposable coveralls or long-sleeved shirt and long pants,
- Chemical resistant gloves, and
- Socks plus industrial grade safety work boots with chemical resistant soles.

All personnel cleaning or maintaining the treatment cylinder gasket/equipment or working with concentrate or wood treatment preservative must wear the following PPE:

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- A full face shield.

In the event of equipment malfunction, or for door spacer placement, all personnel located within 15 feet of the cylinder opening prior to cylinder ventilation must wear the following PPE:

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- A properly fitting half mask elastomeric respirator with appropriate cartridges and/or filters.

Entry to confined spaces is regulated by Federal and/or State Occupational Safety and Health Programs. Compliance is mandated by law. Individuals who enter pressure treatment cylinders or other related equipment that is contaminated with the wood treatment preservative (e.g. cylinders that are not free of treatment preservative or preservative storage tanks) must wear protective clothing and/or equipment as required by Federal and/or State Occupational Safety and Health Compliance laws.

### **USER SAFETY REQUIREMENTS**

Personnel must leave aprons, protective coveralls, chemical resistant gloves, work footwear, and any other material contaminated with preservative at the treatment facility.

Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables exist, use detergent and hot water. Keep and wash PPE separately from other laundry.

Discard clothing and other absorbent material that have been drenched or heavily contaminated with the product's concentrate. Do not reuse them.

Eating, drinking, smoking are prohibited in the treatment cylinder load-out area, drip pad area, and engineering control room of the wood treatment facilities. EXCEPTION: Where treating operator control rooms are isolated from the treating cylinders, drip pad, and work tanks, eating, drinking, and smoking (depending on local restrictions) are permitted.

Users must:

- Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet,
- Remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

## ENVIRONMENTAL HAZARDS

This product is toxic to aquatic organisms. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or other waters unless in accordance with the requirements of a National Pollution Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

## DIRECTIONS FOR USE

**It is a violation of federal law to use this product in a manner inconsistent with its labeling.**

For terrestrial and aquatic nonfood wood/wood structure protection treatments via pressure methods for utility poles/crossarms, railroad ties, switch ties, bridge timbers, fence and guardrail posts, foundation timbers, marine and foundation round piles, sawn lumber and timber products, and exterior structural composite glue laminated wood and plywood products. Treated wood is intended for exterior/outdoor uses only.

## APPLICATION

Engineering Controls to be put in place as of December 31, 2013:

- For pressure treatment with creosote, automatic, remotely operated devices must be used to open, close, lock, and unlock cylinder doors,
- Mechanical methods must be used to place/remove bridge rails

General Instructions for Creosote Pressure Treatment:

- Cylinder openings and door pits must use grating and additional measures such as sumps, dams or other devices which prevent or remove spillage of the preservative.
- Personnel must not directly handle the charge tables, poles or hooks used to retrieve charge cables, or other equipment that has contacted the preservative without wearing chemical resistant gloves.
- In the event of equipment malfunction, or to place the spacer to hold the door open during venting, only personnel wearing specified PPE are permitted within 15 feet of the cylinder opening prior to ventilation.

The Treatment Process:

- A final vacuum must be used to remove excess preservative from the wood. The final vacuum must attain a vacuum equal to or greater than the initial vacuum. This vacuum must be held for an appropriate time period based on wood species, retention levels, and commodity treated to remove excess preservative from the wood.
- After creosote treatment, wood must be moved to a drip pad capable of recovering excess preservative until the wood is drip free.

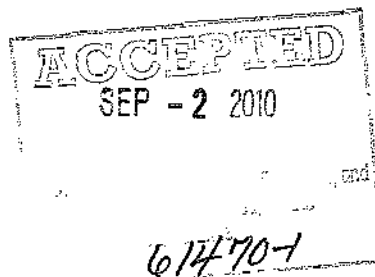
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Creosote-treated wood intended for use in aquatic or marine environments must be processed using one of the following alternative procedures, as determined by the treater:

- **Expansion Bath** – Following the pressure period, creosote should be heated from 10 - 20 degrees F. above press temperatures (consistent with the preservative and species temperature limitations set by AWP) for a minimum of one hour. Pump creosote back to storage and apply a minimum vacuum of 22 inches of Hg (adjusted for location elevation) for a minimum of two hours.
- **Steaming** – Following the pressure period, and after the creosote has been pumped back to the work tank, a vacuum must be applied for a minimum of two hours at not less than 22 inches of Hg (adjusted for location elevation) to recover excess preservative. Release vacuum back to atmospheric pressure and steam for two hours for lumber and timbers and three hours for round piling. Maximum temperature during this process should not exceed 240 degrees F. Apply a second vacuum for a minimum of four hours at 22 inches of Hg (adjusted for location elevation).
- **Double Vacuuming** – Following the pressure period and after the creosote has been pumped back to the work tank, a vacuum must be applied for a minimum of one hour at not less than 22 inches of Hg (adjusted for location elevation) to recover excess preservative. Release vacuum back to atmospheric pressure and then follow with a second vacuum of not less than 22 inches of Hg (adjusted for location elevation) for a minimum period of three hours.

Ventilation Process (at conclusion of treatment) to be put in place as of December 31, 2013:

- The cylinder must be ventilated by purging the post-treatment cylinder through fresh air exchange. The ventilation process is considered complete after a minimum of 2 volume exchanges based on the empty treatment cylinder volume. The exhaust pipe of the vacuum system or any air moving device utilized in conducting the air purge must terminate into a containment vessel such as a treating solution work tank or water/effluent tank.
- The ventilation process may be accomplished by one of the following methods: 1) activating an air purge system that operates while the cylinder door remains closed; or 2) using a device to open and hold open the cylinder door (no more than 6 inches) to allow adequate ventilation and activating the vacuum pump.
- If the second method is utilized, at the conclusion of the treatment, no personnel may be located within 15 feet of the cylinder when open (cracked) until the cylinder has been ventilated.
- After ventilation is complete, the cylinder door may be completely opened.



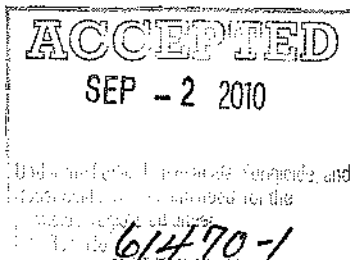


### STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

**Pesticide Storage:** In case of spillage, absorb (with sand, earth, etc.) and dispose of in accordance with applicable Federal, State and local regulations. Contaminated materials must be handled and managed as a RCRA Hazardous Waste and treated before disposal in an approved landfill. This waste is identified by the EPA as a U051 hazardous waste and must meet the treatment standards specified in 40 CFR 268 Subpart D. An RCRA Hazardous Waste Storage permit is required for storage of wastes beyond 90 days.

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Supplemental Labeling for Creosote (P1/P13)  
EPA Reg. No. 61470-1

Creosote (P1/P13) is registered only for pressure treatment of wood. Wood treaters must not knowingly pressure treat wood commodities that are not encompassed by the following use category table, which provides examples from the American Wood Protection Association (AWPA) Use Category System, as set forth in the most current edition of the AWPB Book of Standards.

<b>AWPA Commodity Specification: Crossties and Switch Ties</b>	
<b>AWPA Use Category</b>	<b>Commodity Examples</b>
UC 4A, 4B, and 4C	Crossties and Switch Ties, produced from all wood species recognized by AWPB for this commodity. Manufactured to meet AWPB specifications.

<b>AWPA Commodity Specification: Posts</b>	
<b>AWPA Use Category</b>	<b>Commodity Examples</b>
UC4A	Posts, round, 1/2 and 1/4 round for highway construction (including guide, sign and sight) and farm fencing
UC4B	Posts, round, 1/2 and 1/4 round for highway construction (including guardrail posts, spacer blocks) and for road salt/brine storage Posts, round, 1/2 and 1/4 round for building construction Round posts, for structural members in agricultural uses

<b>AWPA Commodity Specification: Poles</b>	
<b>AWPA Use Category</b>	<b>Commodity Examples</b>
UC 4A, 4B, and 4C	Utility poles (including laminated) Poles for highway and agricultural construction, lighting, building structural use

Note: poles may be glue-or mechanically-laminated

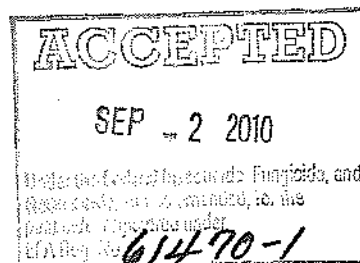
<b>AWPA Commodity Specification: Piling</b>	
<b>AWPA Use Category</b>	<b>Commodity Examples</b>
UC 4C	Foundation and Land & Fresh Water Piles

**AWPA Commodity Specification Marine: (Salt Water/Brackish Water)**  
**Applications**

AWPA Use Category	Commodity Examples
UC 5A, 5B, and 5C	<p>Bulkhead sheathing</p> <p>Lumber/timbers use, including timbers, cross bracing, and highway construction</p> <p>Piles for marine applications</p> <p>Plywood for bridge and marine construction</p>

## AWPA Commodity Specification: Sawn Products

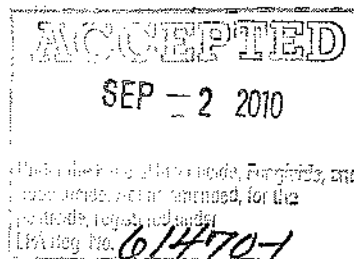
AWPA Use Category	Commodity Examples
UC 1, 2, and 3B	Guardrails for highway construction, including for golf course bridges meeting highway construction standards
UC4A	Lumber/timber for highway construction, including for golf course bridges meeting highway construction standards Crossarms Fence rail (farm/agricultural only, round, ¼ round, ½ round)
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UC4C	Piles for structural support



<b>AWPA Commodity Specification: Wood Composites</b>	
<b>AWPA Use Category</b>	<b>Commodity Examples</b>
UC 1, 2, and 3B	Composite lumber for structural uses Glue- or nail-laminated structural members Plywood for agriculture, and farm use
UC 4A	PSL & LVL composite lumber for highway construction members (laminates) Plywood for bridge and farm/agricultural use
UC 4B	Plywood for marine use in salt water splash zones Plywood for road salt/brine storage, highway construction materials Composite lumber for bridge and highway construction Glue-laminate members (important structural or saltwater splash)
UC4C	Composite (PSL & LVL) lumber highway structural use Members (laminates) for critical structural uses

Note: laminates can be glued or mechanically fastened

Note: PSL = parallel strand lumber, LVL = laminated veneer lumber





RÜTGERS Germany GmbH | Postfach 10 19 80 | 44549 Castrop-Rauxel

Document Processing Desk (NOTIF)  
Attn: Ms. Jacqueline McFarlane  
Office of Pesticides Programs (7504C)  
U. S. Environmental Protection Agency  
Ariel Rios Building  
1200 Pennsylvania Avenue, N. W.  
Washington, D.C. 20460  
USA

Dr. Winfried Boenigk  
Innovation & Regulatory Affairs  
Tel. +49/2305/705-364  
Fax +49/2305/705-628  
winfried.boenigk@ruegters-group.com

01.07.2010

**KGM-B COAL TAR CREOSOTE**  
**EPA Registration No. 61470-1**

Dear Ms McFarlane,

Please find enclosed documents to support RÜTGERS Germany GmbH application dated July 1, 2010. The purpose of this application is to submit final printed label (two copies) of the subject product in accordance with the Agency letter dated May 5, 2010. In addition, the application contains notification for KGM-B COAL TAR CREOSOTE as an alternate name brand, and correction of the physical address of the product registrant.

Specifically enclosed are the following documents:

- EPA Form 8570-1 (Rev 3-94) dated July 1, 2010
- One (1) copy of the redline version of the revised label
- Two (2) copies of the final printed label

"This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labelling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA."

If you have any questions, please contact me.  
Best Regards

Dr. Winfried Boenigk  
Head of Innovation & Regulatory Affairs  
RÜTGERS Germany GmbH  
Fon: +49 2305 705364  
Fax: +49 2305 705628

Dr. Hubertus Appler  
Senior Manager Regulatory Affairs

RÜTGERS Germany GmbH  
Kekuléstraße 30  
44579 Castrop-Rauxel  
Deutschland  
Tel. +49 2305 705-0  
Fax +49 2305 705-221

Vorsitzender des Aufsichtsrats:  
Henri Steinmetz  
Geschäftsführung:  
Heinz Letat, Vorsitzender  
Herbert Knorr  
Sitz: Castrop-Rauxel  
Handelsregister:  
Amtsgericht Co. Land  
HRB 20092  
Ust-ID: DE811112727

KBC Bank Deutschland AG, Düsseldorf  
BLZ: 301 205 00  
EUR - Konto: 0000 2854 67  
USD - Konto: 1107 2854 60  
GBP - Konto: 1607 2854 65  
CAD - Konto: 1307 2854 68

Enclosures

United States <b>EPA Environmental Protection Agency</b> Washington, DC 20460		<input type="checkbox"/> Registration <input type="checkbox"/> Amendment <input checked="" type="checkbox"/> Other	OPP Identifier Number
---	--	--	-----------------------

Application for Pesticide - Section 1			
1. Company/Product Number 61470-1	2. EPA Product Manager Jacqueline McFarlane Acting Product Mgr	3. Proposed Classification	
4. Company/Product (Name) KMG-B COAL TAR CREOSOTE	PM# 34	<input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted	
5. Name and Address of Applicant (Include Zip Code) RÜTGERS Germany GmbH Kekuléstr. 30 Castrop-Rauxel 44579 Germany <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____		

Section - II	
<input type="checkbox"/> Amendment - Explain Below.  <input type="checkbox"/> Resubmission in response to Agency letter dated _____ <input checked="" type="checkbox"/> Notification - Explain below.	<input checked="" type="checkbox"/> Final printed labels in response to Agency letter dated May 5, 2010 <input type="checkbox"/> "Me Too" Application <input type="checkbox"/> Other - Explain below.

**Explanation:** use additional page(s) if necessary. (For section I and section II.)

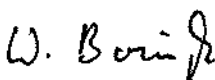
This application is for submission of final printed labels and for notification of product alternate brand name, and correction of registrant address.

This notification is consistent with the provisions of PR Notice 98-1 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152-46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Section - III			
1. Material This Product Will Be Packaged In:			
Child-Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No If "Yes" Unit Packaging Wt. 1000 Lbs	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No If "Yes" Package Wt. _____	2. Type of container <input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (specify Super Sack)
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container	5. Location of Label Directions
6. Manner in Which Label Is Affixed to Product		<input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued	<input type="checkbox"/> Stenciled <input type="checkbox"/> Other

Section - IV		
1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Dr. Hubert R. O'Neal	Title Regulatory Consultant	Telephone No. (Include Area Code) (713) 819-3932
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped)
2. Signature 	3. Title Head of Innovation & Regulatory Affairs	
4. Typed Name Dr. Winfried Boenigk	5. Date July 1, 2010	



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460

MAY - 5 2010

OFFICE OF  
PREVENTION, PESTICIDES  
AND TOXIC SUBSTANCES

Mr. David Crow  
Agent for Creosote Council  
1156 15<sup>th</sup> St NW, Ste 525  
Washington, DC 20005

Subject: KMG-B Coal Tar Solution  
EPA Registration Number: 61470-1

Dear Mr. Crow:

The following amendment submitted in connection with registration under FIFRA, as amended, is acceptable with the conditions listed below.

**Proposed Amendment**

Revise label in accordance with Creosote RED Labeling Requirements

**Conditions**

Revise the label as follows:

- 1.) The "First Aid" statements on page 2 must be reorganized so that the most severe route of exposure, as demonstrated by toxicity classification, is listed first. Therefore, reorganize the list to reflect: "If in eyes, If swallowed, If on skin, and If inhaled."
- 2.) The "Personal Protective Equipment (PPE)" section on page 3 must be revised to be in agreement with the Creosote RED by modifying the 1<sup>st</sup>, 4<sup>th</sup>, and 8<sup>th</sup> bullets by deleting "or" and replacing it with "over" such that the statement read "Washable or disposable coveralls over long-sleeved shirt and long pants. Also, revise the 3<sup>rd</sup>, 6<sup>th</sup>, and 10<sup>th</sup> bullets by indicating safety "work" boots.
- 3.) Revise the first statement in the third paragraph under "User Safety Requirements" on page 3 by deleting the term, has, and replace it with "have" such that the statement reads "Discard clothing and other absorbent material that have been drenched or heavily contaminated with product's concentrate."
- 4.) The "User Safety Recommendations" section on page 3 must be revised to be in compliance with PR Notice 2000-5, Mandatory Labeling, by revising the heading to read "User Safety Requirements" and deleting the term, should, and stating "must."
- 5.) Revise the second statement under "Treatment Process" on page 4 by adding the term, to, to the statement such that it reads "the final vacuum must attain equal to or greater than the initial vacuum..."

CONCURRENCES							
SYMBOL	Revise the third bullet under "Double Vacuuming" by indicating "22 inches of Hg."						
SURNAME							
DATE							

**General Comments**

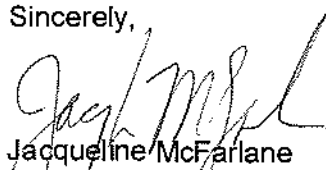
A stamped label with conditions is enclosed for your records. Submit a copy of your final printed label before distributing or selling the product bearing the revised labeling.

Submit and/or cite all data required for registration/reregistration of your product under FIFRA section 3 (c) (5) and section 4 (a) when the Agency requires all registrants of similar products to submit such data.

If the above conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6 (e). Your release for shipment of the product bearing the amended labeling constitutes acceptance of these conditions.

Should you have any questions or comments concerning this letter, you may contact me by telephone at (703) 308-6416 or by e-mail at [campbell-mcfarlane.jacqueline@epa.gov](mailto:campbell-mcfarlane.jacqueline@epa.gov) or Stacey Grigsby by telephone at (703) 308-6440 or by e-mail at [grigsby.stacey@epa.gov](mailto:grigsby.stacey@epa.gov). When submitting information or data in response to this letter, a copy of this letter should accompany the submission to facilitate processing.

Sincerely,



Jacqueline McFarlane  
(Acting) Product Manager (34)  
Regulatory Management Branch II  
Antimicrobials Division (7510P)

Enclosure: EPA stamped label

CONCURRENCES							
SYMBOL							
SURNAME							
DATE							



**RESTRICTED USE PESTICIDE**

Due to chronic toxicity in animal studies

For sale to and use only by Certified Applicators or persons under their direct supervision and only for those uses covered by the Certified Applicator's certification.

# KMG-B COAL TAR CREOSOTE

FOR PRESSURE TREATMENT OF WOOD

**Active Ingredient:**

Coal Tar Creosote (AWPA P1/P13)

98.0 %

CAS No. 8001-58-9

**Inert Ingredients**

2.0 %

**Total**

**100.00%**

## WARNING

See [side] [back] panel for additional precautionary statements, [First Aid], and complete Directions for Use

EPA Reg. No. 61470-1

EPA Est. No.

Net contents \_\_\_\_\_ gallons

**Manufactured by:**

RÜTGERS Germany GmbH

Kekuléstr. 30

Castrop-Rauxel 44579

Germany

ACCEPTED  
with COMMENTS  
EPA Letter Dated:

MAY - 5 2010

Under the Federal Insecticide,  
Fungicide, and Rodenticide Act as  
amended, for the pesticide,  
registered under EPA Reg. No.

61470-1

<b>FIRST AID</b>	
If swallowed	<ul style="list-style-type: none"> <li>• Call poison control center or doctor immediately for treatment advice.</li> <li>• Do not induce vomiting unless told to do so by the poison control center or doctor.</li> <li>• Do not give anything by mouth to an unconscious person.</li> </ul>
If inhaled	<ul style="list-style-type: none"> <li>• Move person to fresh air</li> <li>• If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible.</li> <li>• Call a poison control center or doctor for further treatment advice.</li> </ul>
If in eyes	<ul style="list-style-type: none"> <li>• Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li> <li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
If on skin or clothing	<ul style="list-style-type: none"> <li>• Take off contaminated clothing.</li> <li>• Rinse skin immediately with plenty of water for 15-20 minutes.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
<b>HOTLINE NUMBER</b>	
Have the product label or MSDS with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-800-424-9300 for emergency medical treatment information.	
<b>NOTE TO PHYSICIAN</b>	
Probable mucosal damage may contraindicate the use of gastric lavage. Vomiting may cause aspiration pneumonia.	

### **PRECAUTIONARY STATEMENTS**

#### **HAZARDS TO HUMANS AND DOMESTIC ANIMALS**

**WARNING:** Causes substantial but temporary eye injury. Harmful if swallowed or absorbed through skin. Avoid breathing vapors of heated material. Do not get in eyes, on skin or on clothing. Wear protective eye wear (goggles, protective glasses or face shield). Wash thoroughly after skin contact, before eating, drinking, chewing gum, using tobacco products, or using restrooms. Remove and wash contaminated clothing before reuse. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals.

Prolonged and repeated skin exposure over many years in the absence of recommended hygiene practices may lead to changes in skin pigmentation, benign skin growth and in some cases, result in skin cancer. The inhalation exposure limit to creosote vapor is 0.2 mg/m<sup>3</sup> OSHA PEL (\* Hour TWA) for Coal Tar Pitch Volatiles (benzene soluble fraction) as specified in 29 CFR 1910.1002. Prolonged or repeated inhalation exposure above the limit may lead to respiratory system effects such as inflammation and possibly changes in liver, thyroid and blood elements.

See side panel for additional precautions and First Aid.

### **PERSONAL PROTECTIVE EQUIPMENT (PPE)**

All personnel handling treated wood or handling treating equipment (including poles/hooks used to retrieve charge cables) that has come into contact with preservative must wear the following PPE:

- Washable or disposable coveralls or long-sleeved shirt and long pants,
- Chemical resistant gloves, and
- Socks plus industrial grade safety boots with chemical resistant soles.

All personnel cleaning or maintaining the treatment cylinder gasket/equipment or working with concentrate or wood treatment preservative must wear the following PPE:

- Washable or disposable coveralls or long-sleeved shirt and long pants,
- Chemical resistant gloves,
- Socks plus industrial grade safety boots with chemical resistant soles, and
- A full face shield.

In the event of equipment malfunction, or for door spacer placement, all personnel located within 15 feet of the cylinder opening prior to cylinder ventilation must wear the following PPE:

- Washable or disposable coveralls or long-sleeved shirt and long pants,
- Chemical resistant gloves,
- Socks plus industrial grade safety boots with chemical resistant soles, and
- A properly fitting half mask elastomeric respirator with appropriate cartridges and/or filters.

Entry to confined spaces is regulated by Federal and/or State Occupational Safety and Health Programs. Compliance is mandated by law. Individuals who enter pressure treatment cylinders or other related equipment that is contaminated with the wood treatment preservative (e.g. cylinders that are not free of treatment preservative or preservative storage tanks) must wear protective clothing and/or equipment as required by Federal and/or State Occupational Safety and Health Compliance laws.

### **USER SAFETY REQUIREMENTS**

Personnel must leave aprons, protective coveralls, chemical resistant gloves, work footwear, and any other material contaminated with preservative at the treatment facility.

Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables exist, use detergent and hot water. Keep and wash PPE separately from other laundry.

Discard clothing and other absorbent material that has been drenched or heavily contaminated with the product's concentrate. Do not reuse them.

Eating, drinking, smoking are prohibited in the treatment cylinder load-out area, drip pad area, and engineering control room of the wood treatment facilities. EXCEPTION: Where treating operator control rooms are isolated from the treating cylinders, drip pad, and work tanks, eating, drinking, and smoking (depending on local restrictions) are permitted.

### **USER SAFETY RECOMMENDATIONS**

Users should:

- Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet,
- Remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

## ENVIRONMENTAL HAZARDS

This product is toxic to aquatic organisms. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or other waters unless in accordance with the requirements of a National Pollution Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

## DIRECTIONS FOR USE

**It is a violation of federal law to use this product in a manner inconsistent with its labeling.**

For terrestrial and aquatic nonfood wood/wood structure protection treatments via pressure methods for utility poles/crossarms, railroad ties, switch ties, bridge timbers, fence and guardrail posts, foundation timbers, marine and foundation round piles, sawn lumber and timber products, and exterior structural composite glue laminated wood and plywood products. Treated wood is intended for exterior/outdoor uses only.

## APPLICATION

Engineering Controls to be put in place as of December 31, 2013:

- For pressure treatment with creosote, automatic, remotely operated devices must be used to open, close, lock, and unlock cylinder doors,
- Mechanical methods must be used to place/remove bridge rails

General Instructions for Creosote Pressure Treatment:

- Cylinder openings and door pits must use grating and additional measures such as sumps, dams or other devices which prevent or remove spillage of the preservative.
- Personnel must not directly handle the charge tables, poles or hooks used to retrieve charge cables, or other equipment that has contacted the preservative without wearing chemical resistant gloves.
- In the event of equipment malfunction, or to place the spacer to hold the door open during venting, only personnel wearing specified PPE are permitted within 15 feet of the cylinder opening prior to ventilation.

The Treatment Process:

- A final vacuum must be used to remove excess preservative from the wood. The final vacuum must attain a vacuum equal or greater than the initial vacuum. This vacuum must be held for an appropriate time period based on wood species, retention levels, and commodity treated to remove excess preservative from the wood.
- After creosote treatment, wood must be moved to a drip pad capable of recovering excess preservative until the wood is drip free.

## Post-Treatment Procedures:

Creosote-treated wood intended for use in aquatic or marine environments must be processed using one of the following alternative procedures, as determined by the treater:

- **Expansion Bath** – Following the pressure period, creosote should be heated from 10 - 20 degrees F. above press temperatures (consistent with the preservative and species temperature limitations set by AWWPA) for a minimum of one hour. Pump creosote back to storage and apply a minimum vacuum of 22 inches of Hg (adjusted for location elevation) for a minimum of two hours.
- **Steaming** – Following the pressure period, and after the creosote has been pumped back to the work tank, a vacuum must be applied for a minimum of two hours at not less than 22 inches of Hg (adjusted for location elevation) to recover excess preservative. Release vacuum back to atmospheric pressure and steam for two hours for lumber and timbers and three hours for round piling. Maximum temperature during this process should not exceed 240 degrees F. Apply a second vacuum for a minimum of four hours at 22 inches of Hg (adjusted for location elevation).
- **Double Vacuuming** – Following the pressure period and after the creosote has been pumped back to the work tank, a vacuum must be applied for a minimum of one hour at not less than 22 Hg (adjusted for location elevation) to recover excess preservative. Release vacuum back to atmospheric pressure and then follow with a second vacuum of not less than 22 Hg (adjusted for location elevation) for a minimum period of three hours.

Ventilation Process (at conclusion of treatment) to be put in place as of December 31, 2013:

- The cylinder must be ventilated by purging the post-treatment cylinder through fresh air exchange. The ventilation process is considered complete after a minimum of 2 volume exchanges based on the empty treatment cylinder volume. The exhaust pipe of the vacuum system or any air moving device utilized in conducting the air purge must terminate into a containment vessel such as a treating solution work tank or water/effluent tank.
- The ventilation process may be accomplished by one of the following methods: 1) activating an air purge system that operates while the cylinder door remains closed; or 2) using a device to open and hold open the cylinder door (no more than 6 inches) to allow adequate ventilation and activating the vacuum pump.
- If the second method is utilized, at the conclusion of the treatment, no personnel may be located within 15 feet of the cylinder when open (cracked) until the cylinder has been ventilated.
- After ventilation is complete, the cylinder door may be completely opened.

### STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

**Pesticide Storage:** In case of spillage, absorb (with sand, earth, etc.) and dispose of in accordance with applicable Federal, State and local regulations. Contaminated materials must be handled and managed as a RCRA Hazardous Waste and treated before disposal in an approved landfill. This waste is identified by the EPA as a U051 hazardous waste and must meet the treatment standards specified in 40 CFR 268 Subpart D. An RCRA Hazardous Waste Storage permit is required for storage of wastes beyond 90 days.

**Pesticide Disposal:** Pesticide wastes are toxic. Improper disposal of excess pesticide or rinsate is a violation of Federal Law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

Supplemental Labeling for Creosote (P1/P13)  
EPA Reg. No. 61470-1

Creosote (P1/P13) is registered only for pressure treatment of wood. Wood treaters must not knowingly pressure treat wood commodities that are not encompassed by the following use category table, which provides examples from the American Wood Protection Association (AWPA) Use Category System, as set forth in the most current edition of the AWPAs Book of Standards.

<b>AWPA Commodity Specification: Crossties and Switch Ties</b>	
<b>AWPA Use Category</b>	<b>Commodity Examples</b>
UC 4A, 4B, and 4C	Crossties and Switch Ties, produced from all wood species recognized by AWPAs for this commodity. Manufactured to meet AWPAs specifications.

<b>AWPA Commodity Specification: Posts</b>	
<b>AWPA Use Category</b>	<b>Commodity Examples</b>
UC4A	Posts, round, 1/2 and 1/4 round for highway construction (including guide, sign and sight) and farm fencing
UC4B	Posts, round, 1/2 and 1/4 round for highway construction (including guardrail posts, spacer blocks) and for road salt/brine storage Posts, round, 1/2 and 1/4 round for building construction Round posts, for structural members in agricultural uses

<b>AWPA Commodity Specification: Poles</b>	
<b>AWPA Use Category</b>	<b>Commodity Examples</b>
UC 4A, 4B, and 4C	Utility poles (including laminated) Poles for highway and agricultural construction, lighting, building structural use

Note: poles may be glue-or mechanically-laminated

<b>AWPA Commodity Specification: Piling</b>	
<b>AWPA Use Category</b>	<b>Commodity Examples</b>
UC 4C	Foundation and Land & Fresh Water Piles

<b>AWPA Commodity Specification Marine: (Salt Water/Brackish Water) Applications</b>	
<b>AWPA Use Category</b>	<b>Commodity Examples</b>
UC 5A, 5B, and 5C	Bulkhead sheathing Lumber/timbers use, including timbers, cross bracing, and highway construction Piles for marine applications Plywood for bridge and marine construction

<b>AWPA Commodity Specification: Sawn Products</b>	
<b>AWPA Use Category</b>	<b>Commodity Examples</b>
UC 1, 2, and 3B	Guardrails for highway construction, including for golf course bridges meeting highway construction standards
UC4A	Lumber/timber for highway construction, including for golf course bridges meeting highway construction standards Crossarms Fence rail (farm/agricultural only, round, ¼ round, ½ round)
UC4B	Highway bridge decking (above ground, structural, subject to critical/severe decay) Road salt/brine storage Highway construction materials, including cribbing, lighting Piles (structural support in residential or business construction) Posts (sawn 4 sides) for highway construction, farm/agricultural structural use, spacer blocks, important building structural use Poles for structural building use Lumber/timbers (5 inches or greater) structural use; highway construction and cribbing; retaining walls for highway uses; building support structures Lumber/ Timbers (2 x 8 inch and/or 3 x 6 inch or greater) for marine use (out of water, ground contact, including salt water splash zone)
UC4C	Piles for structural support



<b>AWPA Commodity Specification: Wood Composites</b>	
<b>AWPA Use Category</b>	<b>Commodity Examples</b>
UC 1, 2, and 3B	Composite lumber for structural uses Glue- or nail-laminated structural members Plywood for agriculture, and farm use
UC 4A	PSL & LVL composite lumber for highway construction members (laminates) Plywood for bridge and farm/agricultural use
UC 4B	Plywood for marine use in salt water splash zones Plywood for road salt/brine storage, highway construction materials Composite lumber for bridge and highway construction Glue-laminate members (important structural or saltwater splash)
UC4C	Composite (PSL & LVL) lumber highway structural use Members (laminates) for critical structural uses

Note: laminates can be glued or mechanically fastened

Note: PSL = parallel strand lumber, LVL = laminated veneer lumber

# Receipt for Section 3

S: 856957

Resubmission: ☐ Yes ☒ No

Regulatory Type: Product Registration - Section 3

Fee For Service: ☐ Yes ☒ No

Application Type: Amendment

Billable: ☐ Yes ☒ No

Company: 61470 RUTGERS VFT ☒

Risk Manager: Antimicrobials Division, Risk Management Team 34

Product #: 61470-1 Product Name: KMG-B COAL TAR CREOSOTE

Override#:

Me Too Section 3: Me Too Product Name:

Application Date: 31-Aug-2009 ☒

OPP Rec'd Date: 31-Aug-2009 ☒

Front End Date: 31-Aug-2009 ☒

Risk Manager Send Date: 01-Sep-2009 ☒

FFS Due Date:

Negotiated Due Date:

OPP Target Date:

Fast Track: ☐

New Ingredient: ☐

Receipt Description:

Label amendment

New Ingredient Request Date:

New Ingredient Received Date:

Form A: ☐

Signature Date:

Form B: ☐

Signature Date:

Print Letter

Enter More Information

Tracking

Receipt Content

Des

Paper Label

View/Edit



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

September 1, 2009

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

DAVID HATCHER  
KMG-BERNUTH INC  
RUTGERS VFT  
10611 HARWIN SUITE 402  
HOUSTON, TX 77036

PRODUCT NAME: KMG-B COAL TAR CREOSOTE  
COMPANY NAME: RUTGERS VFT  
OPP IDENTIFICATION NUMBER:  
EPA FILE SYMBOL: 61470-1  
EPA RECEIPT DATE: 08/31/09

SUBJECT: RECEIPT OF AMENDMENT

DEAR REGISTRANT:

The Office of Pesticide Programs has received your application for an amendment and it has passed an administrative screen for completeness.

During the initial screen we determined that the application appears to qualify for fast track review. The package will now be forwarded to the Product Manager for review to determine its acceptability for fast track status.

If you have any questions, please contact Antimicrobials Division, Risk Management Team 34, at (703) 308-6422.

Sincerely,

A handwritten signature in cursive script, appearing to read "P. E. Moore", is positioned above the typed name.

Front End Processing Staff  
Information Services Branch  
Information Technology & Resources Management Division

## Fee for Service

<sup>perm</sup> {856957 ~

This package includes the following

- ☐ New Registration
- ☒ Amendment

- ☐ Studies?      ☐ Fee Waiver?
- ☐ volpay    % Reduction: \_\_\_\_

for Division

- ☒ AD
- ☐ BPPD
- ☐ RD

Risk Mgr. 34

Receipt No.

S- 856957

EPA File Symbol/Reg. No.

61470-1

Pin-Punch Date:

8/31/2009

☒ This item is NOT subject to FFS action.

### Action Code:

Requested:

Granted:

Amount Due: \$ \_\_\_\_\_

### Parent/Child Decisions:

☐ Inert Cleared for Intended Use

☐ Uncleared Inert in Product

Reviewer: McKenna, Carlisle, Hernandez +

Date: 9-1-09

Remarks: Whitaker



United States  
Environmental Protection Agency  
Washington, DC 20460

☐ Registration  
☒ Amendment  
☐ Other

OPP Identifier Number

## Application for Pesticide - Section I

1. Company/Product Number 61470-1	2. EPA Product Manager Diane Isbell	3. Proposed Classification <input type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) KMG-B Coal Tar Creosote	PM#	
5. Name and Address of Applicant (Include ZIP Code) RUTGERS Germany GmbH Kekulestr. 30 Castrop-Rauxel 44579 Germany <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

## Section - II

<input checked="" type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Label amendment to revise the ingredient statement, directions for use and other sections of the label.

This is NOT a PRIA amendment. No payment is required. See cover letter for additional information.

Contact Information: Robert Stewart (202) 828-8963 or rstewart@tsgusa.com

## Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Metal	
* Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt.	No. per container
				<input type="checkbox"/> Plastic	
				<input type="checkbox"/> Glass	
				<input type="checkbox"/> Paper	
				<input type="checkbox"/> Other (Specify) _____	
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/>	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper, glued <input type="checkbox"/> Stenciled				<input type="checkbox"/> Other _____	

## Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)			
Name Robert R. Stewart, Technology Sciences Group, Inc.		Title Regulatory Consultant	
		Telephone No. (Include Area Code) (202) 828-8963	
<b>Certification</b> I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.			6. Date Application Received (Stamped)
2. Signature 		3. Title Regulatory Consultant to RUTGERS Germany GmbH	
4. Typed Name Robert R. Stewart		5. Date 31 August 2009	



**WASHINGTON**

1150 18th Street, N.W.

Suite 1000

Washington, D.C. 20036

Telephone 202 223-4392

Fax 202 872-0745

Diane Isbell (7510P)  
Reregistration Team Leader  
Regulatory Management Branch II  
Antimicrobials Division, OPP  
U.S. Environmental Protection Agency  
One Potomac Yard  
2777 Crystal Drive South  
Arlington, VA 22202

August 31, 2009

**Subject: Label Amendment for KMG-B Coal Tar Creosote (EPA Reg No. 61470-1)**

Dear Diane:

**SACRAMENTO**

712 Fifth Street

Suite A

Davis, CA 95616

Telephone 530 757-1298

Fax 530 757-1299

**This application is being submitted on behalf of RÜTGERS Germany GmbH, a member of the Creosote Council. This is not a PRIA Amendment and therefore requires no payment.**

The Creosote Council, on behalf of its five creosote registrant members, is submitting label amendments for a group of creosote products with identical formulations. The products fall into three subgroups: products containing the P1/P13 fraction of creosote, products containing the P2 creosote fraction, and creosote manufacturing-use products. The active ingredient in all products is coal tar creosote (CAS No. 8001-58-9), which is present at a concentration of 98.0% in P1/P13 products or at a concentration of 95% in P2 products. This group of amendments is being submitted together in an effort to make the labels consistent. While each of the labels will be a separate amendment application, it is important the Agency be aware that the review of the amendment applications for these products should be done together. We would like EPA to provide consistent comments on the entire group of labels.

**CANADA**

275 Slater Street

Suite 900

Ottawa, Ontario

K1P 5H9

Telephone 613 247-6285

Fax 613 236-3754

RÜTGERS Germany GmbH is submitting an application to amend the product label for **KMG-B Coal Tar Creosote (EPA Reg No. 61470-1)**. The following sections of the label have been revised based on the creosote RED and follow up discussions between the Agency and the Creosote Council: ingredient statement, precautionary language, directions for use, and storage and disposal. In addition, the label has been reorganized and formatting changes can be found in the PPE, User Safety Requirements, and User Safety Recommendations sections. A revised CSF has been included to comply with the ingredient statement agreed to by EPA. No data are being submitted with this amendment.

Enclosed are the following items for amending the **KMG-B Coal Tar Creosote** label:

1. Application form;
2. Confidential Statement of Formula; and
3. Five (5) copies of the product label

Thank you for your assistance with this label amendment. If you have any questions, please do not hesitate to contact me at 202-828-8963 or [rstewart@tsgusa.com](mailto:rstewart@tsgusa.com). Your assistance with this submission is greatly appreciated.

Best regards,



Robert R. Stewart  
Regulatory Consultant to RÜTGERS Germany GmbH

Enclosures

